

7 PROJECT ALTERNATIVES

7.1 INTRODUCTION

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

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

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

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

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

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

In determining what alternatives should be considered in the EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although, as noted above, EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to

whether an alternative is feasible or infeasible is made by the lead agency's decision-making body, here the California Department of General Services (DGS). (See PRC Sections 21081.5, 21081[a] [3].)

7.2 CONSIDERATIONS FOR SELECTION OF ALTERNATIVES

7.2.1 Attainment of Project Objectives

As described above, one factor that must be considered in selection of alternatives is the ability of a specific alternative to attain most of the basic objectives of the project (CCR Section 15126.6[a]). Chapter 3, "Project Description," articulates the following project objectives:

- ▲ consolidate State office space and address State office space deficiencies in downtown Sacramento, prioritizing building on underutilized state property;
- ▲ restore functional office space at the vacant California Department of Food and Agriculture Annex at 1215 O Street, while conforming with the Capitol View Protection Act;
- ▲ accommodate staff from State-owned office buildings targeted for renovation or replacement (such as the Bateson Building at 1600 9th Street) to vacate such building(s) and allow for their eventual renovation and re-occupation while minimizing the number of disruptive moves for state agencies;
- ▲ provide a modern, efficient, and safe environment for State employees and the public they serve;
- ▲ integrate the new State development with the existing neighborhood;
- ▲ develop a sustainable and energy-efficient building;
- ▲ encourage and support the use of alternative commute modes by designing the project to have easy access to multiple transit modes (e.g., bus, light-rail); and
- ▲ maximize the effectiveness of the design-build project delivery method by maintaining sufficient flexibility in the performance criteria to support innovation in the design competition.

7.2.2 Environmental Impacts of the 1215 O Street Office Building Project

Sections 4.2 through 4.15 of this DEIR address the environmental impacts of implementation of the proposed 1215 O Street Office Building Project. Potentially feasible alternatives were developed with consideration of avoiding or lessening the significant, and potentially significant, adverse impacts of the project, as identified in Chapter 4 of this DEIR and summarized below. If an environmental issue area analyzed in this DEIR is not addressed below, it is because no significant impacts were identified for that issue area. Two significant and unavoidable environmental impacts resulting from the project were identified. Because it cannot be assured at this time that nighttime construction will not be needed, and if needed that applicable noise standards can be met, construction noise impacts are considered significant and unavoidable. Demolition of the California Department of Food and Agriculture (CDFA) Annex (the existing 1215 O Street office building), which is assumed in this DEIR to qualify as a historic resource under CEQA, is considered a significant and unavoidable impact on cultural resources.

- ▲ **Transportation and Circulation:** The project would add a small number of new trips to the roadway network in the vicinity, but would not cause degradation of levels of service (LOS). The project would result in small increases in freeway off-ramp queues, and transit, bicycle, and pedestrian trips. The project would not result in a substantial increase in vehicle miles traveled (VMT) per service population

(total residents and employees) within the Sacramento Core Area (i.e., Central City Community Plan Area). Existing facilities are more than adequate to accommodate the small increases. Construction of the project would temporarily disrupt traffic in the vicinity of the project site, potentially through lane closures, lane narrowing, and detours. These localized and temporary impacts would be minimized through implementation of a Construction Traffic Management Plan in accordance with City of Sacramento Code. All transportation and circulation impacts would be **less than significant**.

- ▲ **Utilities and Infrastructure:** The existing water delivery infrastructure at the project site includes one water main that could be insufficient to supply water to the 1215 O Street Office Building Project. Mitigation Measure 4.5-2 requires a water study to identify the best location for new service connections for water and fire flow as well as necessary improvements to the water supply system to adequately serve the project and meet applicable requirements. With preparation of the water study and implementation of any identified infrastructure improvements in accordance with Mitigation Measure 4.5-2, the impact on water supply infrastructure capacity would be reduced to a **less-than-significant** level.
- ▲ **Air Quality:** During project construction, emissions of criteria pollutants would not exceed applicable thresholds except for oxides of nitrogen (NO_x). Mitigation Measure 4.6-1 requires implementation of various actions to reduce emissions from construction equipment, resulting in a sufficient limitation of NO_x emissions to reduce this impact to a **less-than-significant** level.
- ▲ **Noise:** During project construction, sufficient noise and groundborne vibration would be generated to exceed applicable thresholds. Mitigation Measures 4.8-1a and 4.8-1b would minimize construction noise at nearby sensitive noise receptors; however, because it cannot be assured at this time that nighttime construction will not be needed, and if needed that applicable noise standards can be met, this impact would be **significant and unavoidable**. Mitigation Measures 4.8-2a and 4.8-2b require study, monitoring, and adjustments to construction methods to ensure that construction generated groundborne vibration would not damage nearby buildings or result in substantial human disturbance. Implementation of these measures would reduce this impact to a **less-than-significant** level. Operation of the proposed loading dock at the new building could generate noise levels at nearby sensitive noise receptors that exceed applicable thresholds. Mitigation Measure 4.8-4 requires that noise generated by the loading dock does not exceed applicable thresholds through adjustments to the loading dock location and design and noise modeling to verify the effectiveness of these measures. Implementation of this measure would reduce this impact to a **less-than-significant** level.
- ▲ **Cultural and Tribal Cultural Resources:** Much of the project site has been disturbed during past development, reducing the potential for sub-surface cultural resources to be present. However, contact with previously undisturbed native soils during construction could result in damage or destruction of currently unrecorded subsurface historic and pre-historic archeological resources, tribal cultural resources, and human remains. Such contact would be most likely during excavation of the basement for the proposed office building. Mitigation Measures 4.12-1, 4.12-2, and 4.12-3 collectively require the presence of archeological and Native American monitors where undisturbed, or minimally disturbed native soils are encountered; stopping work in the vicinity of any area where evidence of historic or pre-historic archeological resources, tribal cultural resources, or human remains are encountered; properly evaluating, documenting, and protecting any finds; and transferring any archeological material or remains removed from the site to an appropriate organization or individual. Implementation of these measures would reduce this impact to a **less-than-significant** level.

With regard to historic architectural resources, the CDFA Annex has been previously identified as eligible for the National Register of Historic Places (NRHP) as a contributor to the California State Government Building Complex historic district (District). The District has also previously been identified as eligible for the NRHP. Based on these past assessments, it is assumed in this DEIR that the CDFA Annex and District both qualify as a historic resource under CEQA. Demolition of the CDFA Annex and replacement with a new office building would result in substantial adverse changes to these historic resources, resulting in a significant impact. Mitigation Measure 4.12-4 would reduce this impact by requiring preparation and

implementation of a salvage report identifying architectural features of the CDFA Annex that could be salvaged and reused in the immediate area and preparing historical resource documentation to collect and preserve key information about the CDFA Annex. These actions would reduce to the degree feasible the impact caused by the demolition of the CDFA Annex Building on the subject building and on the California State Government Building Complex historic district, but would not reduce it to a level that is less than significant. The CDFA Annex building would still be removed and an adverse change to the California State Government Building Complex historic district would still occur. This impact would be **significant and unavoidable**.

- ▲ **Biological Resources:** The project could result in the direct loss or temporary disturbance of trees protected under the City of Sacramento Tree Preservation Ordinance. Implementation of Mitigation Measure 4.13-1 would reduce impacts associated with tree removal to a **less-than-significant** level by providing replacement trees and complying with the City's Tree Preservation Ordinance.
- ▲ **Aesthetics, Light, and Glare:** The proposed solar array above the surface parking lot would likely not be high enough to reflect on buildings to the south, but could shine into north facing windows on the apartment buildings immediately south of the surface parking lot. Therefore, the project could introduce new sources of light and glare that would adversely affect daytime views of adjacent residents. As required by Mitigation Measure 4.15-3, DGS shall ensure that adjacent residents will not be exposed to daytime glare by designing and constructing the solar array above the CalVet surface parking lot in such a manner that the panels do not reflect sunlight into north facing windows of the apartments immediately south of the parking lot. This will reduce the significant glare impact to a **less-than-significant** level.

7.3 ALTERNATIVES CONSIDERED BUT NOT EVALUATED FURTHER

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

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

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

The following alternatives were considered by DGS but are not evaluated further in this DEIR.

7.3.1 Renovate the Existing Building

This alternative considers renovation and reuse of the existing building at 1215 O Street in lieu of demolition and construction of a new building. The building, which was vacated by order of the State Fire Marshal in November 2011, would require major interior renovation to address shortcomings relative to fire and life safety systems, energy efficiency, electrical and plumbing systems, and other deficiencies.

If the existing CDFA Annex was renovated, impacts associated with total demolition of the structure would be avoided, including noise impacts, air emissions, generation and disposal/recycling of construction debris, temporary loss of parking at the CalVet surface parking lot, and potential impacts to soil and groundwater from exposure or contamination. However, renovation of the existing building would be costly, and would not meet several important objectives of the project. First, because the existing building is a four-story structure of approximately 115,000 square feet, it would not provide the additional office space needed to better address State office space deficiencies. The existing building does not have sufficient space to accept all of the Bateson Building employees, requiring current Bateson Building staff to be split among different locations for this building to be fully vacated for eventual renovation. Second, renovation of the existing CDFA Annex would require a reduction in available office space in the building to accommodate desired amenities, such as food service, interpretive center, bicycle parking, and employee fitness center. Third, renovation of the existing building would limit, or make more difficult and expensive, implementation of several proposed sustainability features such as promoting better entry of daylight into the building and utilizing gray water.

As described in Chapter 3, “Project Description,” a study of State office infrastructure in Sacramento (required by Chapter 451, Statutes of 2014 [AB 1656]) documented serious deficiencies with existing downtown buildings that require replacement or renovation. To address office infrastructure needs, the Governor proposed a budget and identified initial projects to better use State-owned land; replacement of the CDFA Annex was identified as one of the initial projects. Also, DGS completed a site study of the CDFA Annex in 2010 to determine the highest and best use of the property and evaluate the cost to renovate the existing building. The site study concluded that it is not cost-effective to renovate the building and recommended replacing the existing structure with a new 11-story office building to maximize State office space on the site while maintaining compliance with the Capitol View Protection Act (DGS 2010).

Because the existing office building is aged, uninhabitable, and would require extensive reconstruction to meet State codes and standards, DGS concluded that renovation would not be a cost-effective approach. In addition, reuse of the existing building would not as effectively achieve the State’s objectives to address office space deficiencies; provide a modern, efficient, and safe workplace for State employees; and develop a sustainable and energy-efficient building. For these reasons, this alternative is not evaluated in detail in this EIR.

7.3.2 Alternative Location

This alternative considers construction of a new building on an alternative site in the downtown area. While this alternative could avoid impacts of building demolition, assuming an alternative site is unoccupied, a fundamental goal of the project as proposed is to achieve the highest and best use of State-owned property, including the CDFA Annex site. Construction of a new office building in an alternative location would not address use of the now vacant, underutilized CDFA Annex, which would still need to be renovated or demolished and repurposed. Importantly, an alternative location may not be near transit, as is the CDFA Annex. As such, an alternative location may not allow the State to achieve the objective of encouraging and supporting the use of alternative transportation through easy access to multiple transit modes (e.g., bus, light rail). For these reasons, this alternative is not evaluated in detail in this EIR.

7.3.3 Multiple Basement Levels

The proposed project includes a single below-grade basement level. This alternative would provide one or more additional basement levels. This approach would increase the total interior square footage for the building, or allow for a smaller above-ground building while maintaining the total square footage assumed for the proposed project. However, as identified in Section 4.9, “Geology and Soils,” depth to groundwater in the downtown Sacramento area varies seasonally and groundwater can be less than 10 feet below the ground surface. Data collected as part of geotechnical studies at the project site showed groundwater being encountered at a depth of approximately 17 feet below the ground surface at the time data was collected. A second or third basement level would encounter groundwater, requiring dewatering during construction, special-engineering techniques to minimize groundwater intrusion into the lower basement levels, and continuous collection and pumping of groundwater away from the basement levels. Additional basement levels would substantially increase construction costs and require ongoing monitoring, maintenance, and costs to pump groundwater away from the lower basement levels as part of ongoing building operations. Project objectives can be achieved without the complexities associated with additional basement levels. Additional basement levels would not result in the avoidance of any significant impacts, and could result in greater environmental effects, such as a higher potential of encountering previously undisturbed native soils that could contain historic or pre-historic archeological resources.

For these reasons, this alternative is not evaluated in detail in this EIR.

7.4 ALTERNATIVES SELECTED FOR DETAILED ANALYSIS

The following alternatives evaluated in this DEIR.

- ▲ **Alternative 1: No Project–No Development Alternative** assumes no demolition of the existing structure nor construction of a new building. The project site would remain in its current condition.
- ▲ **Alternative 2: Reduced Building Size/No Basement Excavation Alternative** assumes project elements and features that are the generally the same as the proposed project, albeit reduced in size because there would be no below-grade level. With no below-grade (basement) level, it is less likely that earth moving or excavations during construction would encounter native soils that could contain cultural resources.
- ▲ **Alternative 3: Capitol Area Plan Housing Alternative** assumes project elements and features that are the same as the proposed project, with the exception that after the office building is constructed and operational, the CalVet surface parking lot would be developed with approximately 100 housing units. Housing development at this site would be consistent with the CAP Implementation Program, which proposes construction of a high-density residential development (approximately 100 housing units) on the site of the current CalVet surface parking lot (identified in the CAP Implementation Program as “Block 222, along O Street”).

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

7.4.1 Alternative 1: No Project–No Development Alternative

Under Alternative 1, the No Project–No Development Alternative, no actions would be taken by DGS and the project site would remain unchanged from current conditions. The CDFA Annex building would remain vacant and in its current condition. The current program of ongoing building inspections and maintenance would continue. No solar panels would be installed over the CalVet parking lot. The segment of O Street in front of

the CDFA Annex and the alley behind the CDFA Annex would not be changed. Although the State's CAP identifies the CDFA Annex site for office and the surface parking lot for housing, this alternative assumes that no development would occur and the project site would remain in its current state. If the Bateson Building were to be vacated to support some future renovation, the existing Bateson Building staff would be relocated to some currently unidentified building or buildings. The No Project – No Development Alternative would not meet the project objectives. However, as required by CEQA, the No Project – No Development Alternative is evaluated in this DEIR.

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

LAND USE

The No Project–No Development Alternative would not be consistent with the objectives of the CAP because it would not meet the State offices objective to provide office space and related services to meet present and future space requirements for the State of California near the State Capitol. In addition, the No Project–No Development Alternative would not support the Sacramento Region Blueprint, 2016 MTS/SCS, City of Sacramento 2035 General Plan, and Central City Community Plan, which like the State's CAP, call for infill development in downtown Sacramento, intensifying uses on underutilized sites near transit, increased opportunities for pedestrian and bicycle use, prioritizing energy and water-efficient buildings and reduction of carbon emissions, and locating jobs closer to housing. This alternative would not restore functional office space at the vacant CDFA Annex site, consolidate and address State office space deficiencies in downtown Sacramento, increase use of underutilized state property, develop an energy-efficient office building near transit lines, or allow for relocation of State employees from other downtown buildings that are in need of renovation or replacement (such as the Bateson Building at 1600 9th Street). In comparison, the proposed project would be consistent with the objectives and purposes of the CAP, the 2015 CAP Progress Report, Governor Brown's 2016 Five-Year Infrastructure Plan, and with local land use plans. Replacement of the vacant CDFA Annex with a new, larger State office building would not result in any conflicts with environmental plans, goals, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts of the No Project–No Development Alternative would be **greater** than those of the proposed project with respect to land use.

POPULATION, EMPLOYMENT, AND HOUSING

The No Project–No Development Alternative would not generate any new residents, jobs, or homes in the City of Sacramento. In comparison, the proposed project would support 200 new State employees and up to 225 temporary construction jobs during peak construction periods; however, new employment would not induce population growth such that there would be an additional demand for housing that could not be met by existing or planned housing in the region. The proposed project would not result in any significant population, employment, or housing impacts, and the No Project–No Development Alternative would generate no new residents, jobs, or homes in Sacramento. Impacts relative to population, employment, and housing would be **similar** to the proposed project.

TRANSPORTATION AND CIRCULATION

The No Project–No Development Alternative would not include any new development and would not generate any new traffic-related impacts. In comparison, the proposed project would add a small number of new trips to the roadway network in the vicinity, but would not cause degradation of LOS. The project would result in small increases in freeway off-ramp queues, and transit, bicycle, and pedestrian trips, but existing facilities are more than adequate to accommodate the small increases. Construction of the project would temporarily disrupt traffic in the vicinity of the project site, potentially through lane closures, lane narrowing, and detours, and these localized and temporary impacts would be minimized through implementation of a

Construction Traffic Management Plan in accordance with City of Sacramento Code. All transportation and circulation impacts would be less than significant. Because the project would not result in significant transportation impacts, the No Project– No Development Alternative would not avoid any such impacts. Because it would result in no impact, however, it would result in transportation and circulation impacts that are **less** than the proposed project.

UTILITIES AND INFRASTRUCTURE

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

AIR QUALITY

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

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

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

NOISE

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

GEOLOGY AND SOILS

The No Project–No Development Alternative would leave the existing CDFA Annex and CalVet surface parking lot in their current state. There would be no potential for increased erosion or increased risk from seismic or soils hazards. Although the proposed project would demolish the existing building and construct a new office building, it would not generate the potential for substantial soil erosion and would result in less-than-significant impacts related to seismic hazards, liquefaction, and expansive soils. Because of developed site conditions and required building standards, neither the proposed project nor the No Project – No Development Alternative would result in significant impacts related to geology and soils. Therefore, the No Project–No Development Alternative would result in impacts that are **similar** to the proposed project with regard to geology and soils.

HYDROLOGY AND WATER QUALITY

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

HAZARDS AND HAZARDOUS MATERIALS

Under the No Project–No Development Alternative, no new facilities that use hazardous materials would be located on the project site and no new workers or visitors would have the potential to be exposed to new or existing sources of hazardous materials. The existing CDFA Annex building has identified hazardous materials such as petroleum hydrocarbons, asbestos, and lead-based paint that would be left in place in the building. In contrast, demolition, excavation and construction activities associated with the project could result in the exposure of construction workers and the public to hazardous materials, including petroleum hydrocarbons, asbestos and lead-based paint identified in the existing building. Contractors and the State would be required to comply with federal, State, and local regulations intended to protect workers and the public from exposure to hazardous or contaminated materials and to ensure the appropriate remediation and disposal of these materials. Compliance with these regulations would prevent the project from resulting in a significant risk to construction workers or the public. Construction and operation of the project would also involve the storage, use, and transport of hazardous materials; however, such use would be done in compliance with federal, State, and local regulations. Although the proposed project would not result in any significant impacts related to hazardous materials and public health, the No Project- No Development Alternative results no disturbance of existing hazardous materials or use of hazardous materials. Therefore, the No Project-No Development Alternative would result in **less** of an impact than the proposed project with regard to hazards and hazardous materials. However, the No Project–No Development Alternative would also foreclose the opportunity to appropriately remediate and dispose of hazardous materials in the existing building.

CULTURAL AND TRIBAL CULTURAL RESOURCES

The No Project–No Development Alternative would not require any building demolition or construction activities, thereby avoiding impacts related to the disturbance, destruction, or alteration of any known or as-yet-undiscovered/unrecorded pre-historic or historic archeological resources, tribal cultural resources, human remains, or historic architectural resources. In comparison, the proposed project would result in ground disturbance and development of new structures that could cause potentially significant impacts related to disturbance of undiscovered/unrecorded subsurface archaeological resources, tribal cultural resources, and human remains. However, these impacts would be reduced to less-than-significant levels after mitigation. The proposed project would result in the demolition of the CDFA Annex, which is considered in this DEIR to qualify as a historic resource under CEQA, and a contributor to the California State Government Building Complex District, which is also assumed to be a CEQA historic resource. Mitigation Measure 4.12-4 would reduce to the degree feasible the impact caused by the demolition of the CDFA Annex on the subject building and on the California State Government Building Complex historic district, but would not reduce it to a less-than-significant level. The CDFA Annex building would still be removed and an adverse change to the California State Government Building Complex historic district would still occur. This impact would be significant and unavoidable. Because the No Project–No Development Alternative does not include any new development, ground disturbance, or building demolition, it has a lesser potential to result in the disturbance of as-yet undiscovered subsurface archaeological resources and/or human remains and would not adversely affect historic structures. However, under the No Project-No Development Alternative, there is the potential for an ongoing degradation of the CDFA Annex’s quality as a cultural resource and a historic Office Complex contributor through “demolition by neglect” as the unoccupied building ages. The existing building monitoring and maintenance program would need to continue to preserve the building, although some level of degradation would likely occur over time due to age and exposure to the elements. Overall, cultural resources impacts under the No Project–No Development Alternative would be **less** than the proposed project.

BIOLOGICAL RESOURCES

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

PUBLIC SERVICES

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

ASTHETICS, LIGHT, AND GLARE

Under the No Project–No Development Alternative, no new development would occur. There would be no alteration of the visual character of the project site; views of the area from surrounding vantage points would

not change; and no new sources of light and glare would be created. In comparison, the proposed project would replace the existing four-story CDFA Annex with a new office building and install solar panels over the CalVet surface parking lot. Because the proposed project is located on a site with an existing office building and surface parking lot surrounded by a mix of low-rise, mid-rise, and high-rise buildings, the local visual character, as experienced by viewer groups in the area, would not be substantially altered. Potential glare from the solar panels would be mitigated to less than significant through design and direction of the panels. Because the proposed project would not result in any significant impacts related to aesthetics, light, and glare, the No Project-No Development Alternative would not avoid any significant impacts. However, the No Project-No Development Alternative would make no changes to the visual character of the site and would avoid any potential glare impacts; therefore, the No Project- No Development Alternative would result in **less** of an impact than the proposed project with regard to visual impacts.

7.4.2 Alternative 2: Reduced Building Size/No Basement Excavation Alternative

Alternative 2, the Reduced Building Size/No Basement Excavation Alternative is the same as the proposed project in several respects. The Reduced Building Size/No Basement Excavation Alternative includes demolition of the CDFA Annex, construction of a new office building, rooftop solar on the new office building, implementation of the same energy efficiency programs, use of the CalVet parking lot for construction staging and a solar array, and relocation of employees from the Bateson Building and other locations consistent with the proposed project. Where the Reduced Building Size/No Basement Excavation Alternative differs from the proposed project is that the office building would not include a below-grade level. This alternative was selected for analysis because with no below-grade (basement) level, it is less likely that earth moving or excavation during construction would encounter native soils that could contain cultural resources or human remains. Therefore, this alternative could have a reduced construction timeframe and minimize or avoid significant impacts on cultural resources identified for the proposed project.

This alternative also serves as a reduced building size alternative. Under the Reduced Building Size/No Basement Excavation Alternative, it is assumed that the new office building would not exceed 150-feet in height, in compliance with the Capitol View Protection Act. It is also assumed that the new office building would cover roughly the same footprint as the proposed project. Therefore, the above-ground floors would have approximately the same square footage as those of the proposed project. Facilities and uses that may have been placed in the approximately 34,000 gross square foot (GSF) basement under the proposed project would either need to be moved to the above-ground floors, or not included in the building under the Reduced Building Size/No Basement Excavation Alternative. With a fixed amount of above-ground square footage and former basement uses needing to be moved to above-ground floors, The Reduced Building Size/No Basement Excavation Alternative would result in some reduction in the available office space compared to the proposed project. It would be speculative to attempt to determine what adjustments would be made to the types, locations, and sizes of building uses. However, for the purposes of this analysis, it is assumed that there would be a reduction in available office space under the Reduced Building Size/No Basement Excavation Alternative compared to the proposed project, which would result in a maximum employee capacity of approximately 1,100 seats compared to the 1,200 seats evaluated for the proposed project.

LAND USE

The lack of a basement or below-grade level under the Reduced Building Size/No Basement Excavation Alternative does not affect consistency with land use plans, policies, or regulations. The office building and solar array that would be constructed under the Reduced Building Size/No Basement Excavation Alternative, although smaller than the proposed project, would be consistent with the objectives and purposes of the CAP, the 2015 CAP Progress Report, Governor Brown's 2016 Five-Year Infrastructure Plan, and with local land use plans. Like the proposed project, the Reduced Building Size/No Basement Excavation Alternative would replace the vacant CDFA Annex with a new, larger State office building and would not result in any conflicts with environmental plans, goals, or regulations adopted for the purpose of avoiding or mitigating an

environmental effect. Therefore, land use impacts under the Reduced Building Size/No Basement Excavation Alternative would be **similar** to those of the proposed project.

POPULATION, EMPLOYMENT, AND HOUSING

Like the proposed project, the Reduced Building Size/No Basement Excavation Alternative would not result in development of any new homes or generation of new residents. The proposed project would support up to 225 temporary construction jobs during peak construction periods and approximately 200 new State employees on a permanent basis. Without the excavation and below-ground construction required for the basement level, the overall construction effort would be reduced, and this alternative could require fewer construction jobs than the proposed project. Similarly, the reduction in office space and employee capacity in the building under the Reduced Building Size/No Basement Excavation Alternative would result in supporting roughly 100 fewer permanent State employees than the proposed project. Although the proposed project would not generate new employment that would induce population growth such that there would be an additional demand for housing that could not be met by existing or planned housing in the region, the Reduced Building Size/No Basement Excavation Alternative would have an incrementally reduced impact due to less construction and less employee office space. The Reduced Building Size/No Basement Excavation Alternative would have **less** of an impact on population, employment, and housing compared to the proposed project.

TRANSPORTATION AND CIRCULATION

Because the Reduced Building Size/No Basement Excavation Alternative would not include excavation of a basement level, it would reduce the construction effort and would generate less short-term construction traffic. Because the Reduced Building Size/No Basement Excavation Alternative would accommodate 100 fewer State employees than the proposed project, local traffic impacts would be slightly reduced. It is unknown where these employees would otherwise work; they could remain in, or be transferred to existing State buildings in the downtown Sacramento area, resulting in a continued contribution to traffic impacts on local downtown intersections. If these employees are located in buildings either inside or outside the downtown area that are not as well served by transit as the project site, more employees may drive rather than using transit, resulting in more vehicle trips and more vehicle miles travelled (VMT) than the proposed project. Ultimately, the vehicle trips generated by 100 State employees is only a small percentage of the overall traffic volumes in the downtown area and the region. It is likely that any differences in traffic impacts between the Reduced Building Size/No Basement Excavation Alternative and the proposed project would be minor, and overall impacts under the Reduced Building Size/No Basement Excavation Alternative would be **similar** to those for the proposed project.

UTILITIES AND INFRASTRUCTURE

The Reduced Building Size/No Basement Excavation Alternative includes an office building with fewer square feet and supporting approximately 100 fewer employees than the proposed project. Therefore, this alternative would result in an incrementally lower demand for water, wastewater treatment, electricity, and natural gas. Because above-ground exterior building and site features would be the same as the proposed project, stormwater runoff and demand for stormwater conveyance capacity would be the same. Although the office building under the Reduced Building Size/No Basement Excavation Alternative would support fewer employees, it is likely that any State employees not working at the 1215 O Street office building would work somewhere in the service area of the Sacramento Regional Wastewater Treatment Plant. Therefore, both alternatives would generate the same demand for wastewater treatment services, even if the wastewater is generated at different locations. The proposed project would result in significant impacts associated with wastewater conveyance and treatment. However, these impacts would be reduced to less-than-significant levels with mitigation. A similar impact and need for mitigation would occur under the Reduced Building Size/No Basement Excavation Alternative, although the volume of wastewater generated and need for local conveyance infrastructure would be somewhat less. The proposed project would not result

in significant utilities impacts after mitigation; although the Reduced Building Size/No Basement Excavation Alternative would reduce utility demands, it would result in **similar** impacts to those of the proposed project.

AIR QUALITY

Similar to the proposed project, the Reduced Building Size/No Basement Excavation Alternative would include demolition of the CDFA Annex, construction of a new office building, and installation of solar panels on the new office building and over the CalVet parking lot, which would generate significant but mitigable construction-related air emissions. After mitigation, this impact would be reduced to less-than-significant levels under both the proposed project and the Reduced Building Size/No Basement Excavation Alternative. Implementation of the Reduced Building Size/No Basement Excavation Alternative would reduce excavation associated with construction, which would incrementally reduce construction-related emissions. In addition, the reduction of approximately 100 State employees in the building would reduce operations-related air emissions. However, transportation-related emissions may not be reduced under the Reduced Building Size/No Basement Excavation Alternative because the 100 employees not transferred to the new office building could be located in buildings either inside or outside the downtown area that are not as well served by transit as 1215 O Street. Therefore, more employees may drive rather than using transit, resulting in more vehicle trips, more VMT, and more associated air emissions. The proposed project would not result in significant impacts after mitigation; therefore, the Reduced Building Size/No Basement Excavation Alternative would not avoid any significant impacts. However, the Reduced Building Size/No Basement Excavation Alternative would reduce construction- and operational-air emissions relative to the proposed project, resulting in **less** severe air-quality impacts than the proposed project.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Similar to the proposed project, the Reduced Building Size/No Basement Excavation Alternative would include demolition of the CDFA Annex, construction of a new office building, and installation of solar panels on the new office building and over the CalVet parking lot, which would generate less-than-significant construction- and operations-related GHG emissions. Implementation of the Reduced Building Size/No Basement Excavation Alternative would reduce excavation associated with construction, which would reduce construction-related emissions. In addition, the reduction of approximately 100 State employees in the building would reduce operations-related GHG emissions. However, transportation-related emissions may not be reduced in the Reduced Building Size/No Basement Excavation Alternative because the 100 employees not transferred to the new office building could be located in buildings either inside or outside the downtown area that are not as well served by transit as 1215 O Street. Therefore, more employees may drive rather than using transit, resulting in more vehicle trips, more VMT, and more associated GHG emissions. The proposed project would result in less-than-significant GHG impacts; therefore, the Reduced Building Size/No Basement Excavation Alternative would not avoid any significant impacts. However, the Reduced Building Size/No Basement Excavation Alternative would reduce construction-GHG emissions and likely would also have reduced operational-GHG emissions relative to the proposed project, resulting in impacts that are somewhat **less** than the proposed project relative to GHG emissions and climate change.

NOISE

Similar to the proposed project, the Reduced Building Size/No Basement Excavation Alternative would include demolition of the CDFA Annex, construction of a new office building, and use of the CalVet parking lot for construction staging. The Reduced Building Size/No Basement Excavation Alternative would reduce construction excavation activities, reducing construction-related noise. However, the Reduced Building Size/No Basement Excavation Alternative would result in similar significant and unavoidable construction noise impacts and significant but mitigable construction-generated vibration impacts and noise impacts from building operation. Implementation of the Reduced Building Size/No Basement Excavation Alternative would result in a limited reduction in construction noise by reducing excavation. However, the overall construction and operational noise impacts of the Reduced Building Size/No Basement Excavation Alternative would be **similar** to the noise impacts of the proposed project.

GEOLOGY AND SOILS

Although the Reduced Building Size/No Basement Excavation Alternative would reduce excavation of soils by not including a basement level to the building, it would build a similar office building and solar panels as the proposed project. The Reduced Building Size/No Basement Excavation Alternative would reduce the less-than-significant construction-related erosion impacts, but the potential increase in the risk of exposure to injury or property damage because of a seismic event would be the same for the Reduced Building Size/No Basement Excavation Alternative as the proposed project. Because of the same existing site conditions for both alternatives and required compliance with building standards, neither the proposed project nor the Reduced Building Size/No Basement Excavation Alternative would result in significant impacts related to geology and soils. Therefore, the Reduced Building Size/No Basement Excavation Alternative and the proposed project would have **similar** impacts related to geology and soils.

HYDROLOGY AND WATER QUALITY

The Reduced Building Size/No Basement Excavation Alternative would require less excavation of soils during construction, which would reduce the potential for construction-related releases of sediment and contaminants into surface waters or groundwater in comparison to the proposed project. The Reduced Building Size/No Basement Excavation Alternative would result in a new office building and related features similar to the proposed project. Because the project site is already developed with an office building and surface parking lot, long-term changes to runoff and water quality resulting from the project are considered less than significant and would be less than significant under the Reduced Building Size/No Basement Excavation Alternative as well. Similarly, various stormwater pollution prevention devices and BMPs would be implemented, and like the project, the Reduced Building Size/No Basement Excavation Alternative would be required to comply with existing State and local regulations regarding the City's CSS and NPDES permits. Implementation of BMPs and compliance with State and local requirements would result in similar runoff and water quality during storm events as under existing conditions. Furthermore, rainwater would be collected, treated, stored, and used in the new office building, reducing stormwater runoff from the project site. The Reduced Building Size/No Basement Excavation Alternative, like the proposed project, would not result in any significant impacts related to hydrology and water quality. Therefore, the Reduced Building Size/No Basement Excavation Alternative would result in **similar** impacts to the proposed project with regard to hydrology and water quality.

HAZARDS AND HAZARDOUS MATERIALS

Like the proposed project, demolition, excavation and construction activities associated with the Reduced Building Size/No Basement Excavation Alternative could result in the exposure of construction workers and the public to hazardous materials, including petroleum hydrocarbons, asbestos, and lead-based paint identified in the existing CDFA Annex. Contractors and the State would be required to comply with federal, State, and local regulations intended to protect workers and the public from exposure to hazardous or contaminated materials and to ensure the appropriate remediation and disposal of these materials. Compliance with these regulations would prevent a significant risk to construction workers or the public under either the project or the Reduced Building Size/No Basement Excavation Alternative. Construction and operation of either the proposed project or the Reduced Building Size/No Basement Excavation Alternative would also involve the storage, use, and transport of hazardous materials; however, such use would be done in compliance with federal, State, and local regulations. Because neither the project nor the Reduced Building Size/No Basement Excavation Alternative would result in any significant impacts related to hazardous materials and public health, the Reduced Building Size/No Basement Excavation Alternative would have **similar** impacts as the proposed project with regard to hazardous materials and public health.

CULTURAL AND TRIBAL CULTURAL RESOURCES

The Reduced Building Size/No Basement Excavation Alternative would require less excavation of soils during construction, which would reduce the ground disturbance associated with the project and reduce the

potential to disturb undiscovered/unrecorded subsurface archaeological resources, tribal cultural resources, and human remains. Like the proposed project, the Reduced Building Size/No Basement Excavation Alternative would result in the demolition of the CDFA Annex and would implement Mitigation Measure 4.12-4 to minimize the impact caused by the demolition of the CDFA Annex Building on the subject building and on the California State Government Building Complex historic district. However, like under the proposed project, the demolition of the CDFA Annex would be a significant and unavoidable impact to historic resources. Although the Reduced Building Size/No Basement Excavation Alternative would not avoid the significant and unavoidable historic resource impact related to the project, it would reduce ground disturbance, which would result in **less** potential to disturb as-yet undiscovered subsurface archaeological resources and/or human remains.

BIOLOGICAL RESOURCES

The Reduced Building Size/No Basement Excavation Alternative would develop the same project site with the same above-ground structures as the proposed project. The project site is currently developed with urban uses and lacks sensitive species or their habitat. As with the proposed project, the only potential biological resources impact would be removal or disturbance of street trees, which would be replaced if needed, resulting in a less-than-significant impact. The Reduced Building Size/No Basement Excavation Alternative would have **similar** biological resource impacts as the proposed project.

PUBLIC SERVICES

Similar to the proposed project, the Reduced Building Size/No Basement Excavation Alternative would develop a new office building with a net increase of employees in the downtown area. The increased number of employees would result in a minor increase in demand for fire, police, solid waste disposal, and parks and recreation facilities. Under both the proposed project and the Reduced Building Size/No Basement Excavation Alternative, increased demands for public services would be less than significant. Because the office building in the Reduced Building Size/No Basement Excavation Alternative would support approximately 100 fewer employees, this alternative would reduce the incremental increase in service demand that would occur under the project. However, the 100 employees not transferred to the new office building could be located in buildings either inside or outside the downtown area, potentially resulting in the same demand for public services as the proposed project, but in different locations. Therefore, impacts of this alternative on public services are considered to be **similar** to those of the project.

ASTHETICS, LIGHT, AND GLARE

Both the Reduced Building Size/No Basement Excavation Alternative and the proposed project would replace the existing four-story CDFA Annex with a new office building up to 150-feet tall and install solar panels over the CalVet surface parking lot. Because the project site is developed with an existing office building and surface parking lot and surrounded by a mix of low-rise, mid-rise, and high-rise buildings, the local visual character, as experienced by viewer groups in the area, would not be substantially altered under either the proposed project or the Reduced Building Size/No Basement Excavation Alternative. Potential glare from the solar panels would be mitigated to less than significant through design and direction of the panels. Neither the project nor the Reduced Building Size/No Basement Excavation Alternative would result in any significant impacts related to aesthetics, light, and glare; therefore, the Reduced Building Size/No Basement Excavation Alternative would have **similar** impacts as the project.

7.4.3 Alternative 3: Capitol Area Plan Housing Alternative

Alternative 3, the Capitol Area Plan Housing Alternative, includes the same office building at 1215 O Street as the proposed project. All aspects of building construction, operation, staffing, and other factors would be the same as the proposed project. Where the Capitol Area Plan Housing Alternative differs from the

proposed project is in the treatment of the CalVet parking lot. After construction of the 1215 O Street Office Building is complete and the CalVet parking lot is no longer needed as a construction staging area, the parking lot would be removed and developed with approximately 100 housing units. This housing development would be consistent with the CAP Implementation Program, which proposes construction of a high-density residential development (approximately 100 housing units) on the site of the current CalVet surface parking lot (identified in the CAP Implementation Program as “Block 222, along O Street”).

The solar panels that would be placed on the solar array in the parking lot as part of the proposed project would instead be placed on the rooves of the housing units. These solar panels would supply electricity to the 1215 O Street Office Building to support the Zero Net Energy (ZNE) objective. Therefore, it is assumed that there would not be space for rooftop solar to serve the housing units under this alternative.

LAND USE

The office building and solar array that would be constructed under the Capitol Area Plan Housing Alternative and the proposed project would both be consistent with the objectives and purposes of the CAP, the 2015 CAP Progress Report, Governor Brown’s 2016 Five-Year Infrastructure Plan, and with local land use plans. Like the proposed project, replacement of the vacant CDFA Annex with a new, larger State office building would not conflict with environmental plans, goals, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The addition of housing units in the Capitol Area Plan Housing Alternative would also be consistent with the CAP and CAP Implementation Program, which identify the CalVet surface parking lot site for housing and propose approximately 100 housing units for the site. Furthermore, the housing units would support local land use plans for the City that promote locating housing near employment and intensifying use of sites in downtown Sacramento. Therefore, land use impacts under the Capitol Area Plan Housing Alternative would be **similar** to impacts under the proposed project.

POPULATION, EMPLOYMENT, AND HOUSING

The Capitol Area Plan Housing Alternative would construct approximately 100 new housing units in addition to the new office building. In contrast, the proposed project would not provide any new housing units. The housing units constructed under the Capitol Area Plan Housing Alternative would result in an associated increase in population in Sacramento. However, the housing would be located adjacent to employment in downtown and would contribute to improving the jobs/housing index (which was estimated 1.11 in 2015, indicating that employment growth was slightly outpacing housing growth). Like the proposed project, the Capitol Area Plan Housing Alternative would support up to 225 temporary construction jobs during peak construction periods and approximately 200 new State employees. In addition, the Capitol Area Plan Housing Alternative would provide for additional temporary construction work during the construction of the housing units. However, neither the Capitol Area Plan Housing Alternative nor the proposed project would generate sufficient new employment that would induce population growth such that there would be an additional demand for housing that could not be met by existing or planned housing in the region. Because the Capitol Area Plan Housing Alternative would include the construction of housing units not included in the proposed project, and improve the jobs housing balance, the Capitol Area Plan Housing Alternative would result in **less** impact related to population, employment, and housing.

TRANSPORATION AND CIRCULATION

The Capitol Area Plan Housing Alternative would result in the same office building as the proposed project and, therefore, the same less-than-significant impacts on the roadway network LOS; freeway off-ramp queues; VMT; transit, bicycle, and pedestrian trips; and construction traffic. Because the Capitol Area Plan Housing Alternative also includes the housing units, temporary traffic impacts from the additional construction would be greater, and long-term trip generation by new residents would also increase. However, because the housing would be located near employment opportunities in downtown and near transit lines, VMT could be lower than housing developed elsewhere in the city. However, because of the longer construction period combined increase in both employees and residents under the Capitol Area Plan

Housing Alternative, overall transportation and circulation impacts under this alternative would be **greater** than the proposed project.

UTILITIES AND INFRASTRUCTURE

The Capitol Area Plan Housing Alternative would result in the same office building as the proposed project and, therefore, the same office-related demand for water, wastewater treatment, electricity, and natural gas. The Capitol Area Plan Housing Alternative would increase demand for all utilities because of the addition of approximately 100 housing units on the CalVet parking lot site. Because the existing project site is developed with urban uses, the replacement of the CDFA Annex and the addition of housing units in the Capitol Area Plan Housing Alternative would not substantially change the extent of impervious surfaces, and consequently, the need for stormwater conveyance capacity. Both the proposed project and the Capitol Area Plan Housing Alternative would result in significant impacts associated with wastewater conveyance and treatment; however, these impacts would be reduced to less-than-significant levels with mitigation. Although impacts would be less than significant, or mitigable to less-than-significant levels, the housing units in the Capitol Area Plan Housing Alternative would increase demand for utilities and therefore result in **greater** impacts to utility service and infrastructure than those of the proposed project.

AIR QUALITY

Similar to the proposed project, the Capitol Area Plan Housing Alternative would include demolition of the CDFA Annex, construction of a new office building, and installation of solar panels, which would generate significant but mitigable construction-related air emissions. However, implementation of the Capitol Area Plan Housing Alternative would increase construction emissions due to construction of approximately 100 housing units. Those units would also result in an increase in operations-related air emissions and transportation-related emissions. Although the housing would be located near employment and transit, potentially resulting in reduced VMT and associated emissions compared to other housing locations in the city, the housing-related vehicle trips and associated emissions would be an increase over the proposed project. Therefore, the Capitol Area Plan Housing Alternative would result in **greater** construction- and operational-air emissions relative to the proposed project.

GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

Similar to the proposed project, the Capitol Area Plan Housing Alternative would include demolition of the CDFA Annex, construction of a new office building, and installation of solar panels, which would generate less-than-significant construction- and operations-related GHG emissions. However, implementation of the Capitol Area Plan Housing Alternative would increase GHG emissions due to construction and operation of approximately 100 housing units. The housing units would not have the opportunity to obtain electricity from rooftop solar because rooftop solar panels placed on the housing would serve the 1215 O Street Office Building. Although the housing would be located near employment and transit, potentially resulting in reduced VMT and an associated reduction in GHG emissions compared to other housing locations in the city, the housing-related GHG emissions would likely increase the overall project emissions compared to emissions resulting from the proposed project. Therefore, the Capitol Area Plan Housing Alternative would result in **greater** GHG emissions relative to the proposed project.

NOISE

Similar to the proposed project, the Capitol Area Plan Housing Alternative would include demolition of the CDFA Annex, construction of a new office building, and use of the CalVet parking lot for construction staging. All construction noise impacts related to the 1215 O St. office building would be the same under the Capitol Area Plan Housing Alternative. However, after construction of the office building is complete, the Capitol Area Plan Housing Alternative would construct housing on the CalVet parking lot site, thereby extending the timeframe of construction noise. It is highly unlikely that construction of housing would require pile driving or nighttime construction; therefore, construction of the housing would not contribute to the significant

construction noise effects associated with the 1215 O Street Office Building. Although construction of housing would extend the project's construction period over a longer timeframe, the housing included in the Capitol Area Plan Housing Alternative would not result in significant noise or vibration impacts due to the nature of residential construction. The housing included in the Capitol Area Plan Housing Alternative would provide an additional source of operational noise compared to the proposed project, including increasing vehicle trips and traffic noise. However, given the relatively low traffic volumes in the project vicinity, and the compatibility of existing residential land uses with noise conditions in the project area, providing 100 housing units on the existing CalVet surface parking lot would not result in a significant increase in noise at nearby sensitive receptors. Residential uses on the CalVet parking lot, like other existing residential uses in the project area, would not experience significant adverse effects from existing noise and vibration conditions. The overall construction and operational noise impacts of the Capitol Area Plan Housing Alternative would be **similar** to the noise impacts of the proposed project.

GEOLOGY AND SOILS

Similar to the proposed project, the Capitol Area Plan Housing Alternative would result in less-than-significant construction-related erosion impacts, because the same project site would be disturbed during construction activities. Although the Capitol Area Plan Housing Alternative would include approximately 100 housing units on the CalVet parking lot site, the existing geological and soils conditions are the same for both the proposed project and the Capitol Area Plan Housing Alternative and both require compliance with building standards. Therefore, neither the proposed project nor the Capitol Area Plan Housing Alternative would result in significant impacts related to geology and soils. The Capitol Area Plan Housing Alternative and the proposed project would have **similar** impacts related to geology and soils.

HYDROLOGY AND WATER QUALITY

The Capitol Area Plan Housing Alternative would result in a new office building and features similar to the proposed project, but would also result in the construction of approximately 100 housing units. Because the project site is already developed with an office building and surface parking lot, long-term changes to runoff and water quality resulting from the project would be less than significant for the proposed project and would be less than significant for the Capitol Area Plan Housing Alternative as well. Similarly, various stormwater pollution prevention features and BMPs would be implemented. However, the Capitol Area Plan Housing Alternative would increase flows to the City's CSS relative to the proposed project, due to additional wastewater flows from the housing units. Implementation of BMPs and compliance with State and local requirements would result in similar runoff and water quality during storm events as under existing conditions. Furthermore, rainwater would be collected, treated, stored, and used in the new office building, reducing stormwater runoff from the project site. Like the proposed project, the Capitol Area Plan Housing Alternative would not result in any significant impacts related to hydrology and water quality; however, because of the incremental increase in flows to the CSS, the Capitol Area Plan Housing Alternative would result in **greater** wastewater flows than the project.

HAZARDS AND HAZARDOUS MATERIALS

Like the proposed project, demolition, excavation and construction activities associated with the Capitol Area Plan Housing Alternative could result in the exposure of construction workers and the public to hazardous materials, including petroleum hydrocarbons, asbestos and lead-based paint identified in the existing CDFA Annex. Contractors and the State would be required to comply with federal, State, and local regulations intended to protect workers and the public from exposure to hazardous or contaminated materials and to ensure the appropriate remediation and disposal of these materials. Compliance with these regulations would prevent a significant risk to construction workers and the public under both the proposed project and the Capitol Area Plan Housing Alternative. As with the proposed project, construction and operation of the Capitol Area Plan Housing Alternative would also involve the storage, use, and transport of hazardous materials; however, such use would be in compliance with federal, State, and local regulations. Although the Capitol Area Plan Housing Alternative would include the additional housing units, neither the project nor the

Capitol Area Plan Housing Alternative would result in any significant impacts related to hazardous materials or public health, the Capitol Area Plan Housing Alternative would have **similar** hazards and hazardous materials impacts as compared to the project.

CULTURAL AND TRIBAL CULTURAL RESOURCES

The Capitol Area Plan Housing Alternative would require the same excavation of soils during construction of the office building and would potentially disturb additional soils due to construction of housing units on the CalVet parking lot site, which could increase the potential to disturb undiscovered/unrecorded subsurface archaeological resources, tribal cultural resources, and human remains. Like the proposed project, the Capitol Area Plan Housing Alternative would result in the demolition of the CDFA Annex and would implement Mitigation Measure 4.12-4 to reduce to the extent feasible the impact caused by the demolition of the CDFA Annex Building and on the California State Government Building Complex historic district. However, like the proposed project, demolition of the CDFA Annex would be a significant and unavoidable impact to historic resources. Because the Capitol Area Plan Housing Alternative would result in the same significant and unavoidable historic resource impact related to the project and it would increase ground disturbance due to housing construction, it would have a **greater** potential to disturb as-yet undiscovered subsurface archaeological resources and/or human remains.

BIOLOGICAL RESOURCES

The Capitol Area Plan Housing Alternative would develop the same site as the proposed project, which is currently developed with urban uses and is devoid of sensitive species and habitat. As with the proposed project, the only potential project impact would be removal or disturbance of street trees, which would be replaced, resulting in a less-than-significant impact. Although the Capitol Area Plan Housing Alternative also includes construction of housing units, that site is also devoid of any sensitive biological resources. The Capitol Area Plan Housing Alternative would have **similar** biological resource impacts to the project.

PUBLIC SERVICES

The Capitol Area Plan Housing Alternative would develop housing in addition to a new office building, resulting in increased demand for fire and police services, solid waste disposal, and parks and recreation and school facilities, as compared to the proposed project. It is anticipated that such increases would be less than significant or mitigable to less-than-significant levels. Generally, however, the Capitol Area Plan Housing Alternative would result in **greater** impacts on public services than the project.

ASTHETICS, LIGHT, AND GLARE

Both the Capitol Area Plan Housing Alternative and the proposed project would replace the existing four-story CDFA Annex with a new office building, but the Capitol Area Plan Housing Alternative would also construct housing units on the CalVet parking lot site. Because the project site is developed with an existing office building and surface parking lot and surrounded by a mix of low-rise, mid-rise, and high-rise buildings, the local visual character, as experienced by viewer groups in the area, would not be substantially altered under either the project or the Capitol Area Plan Housing Alternative. Potential glare from the solar panels would occur with both the proposed project and the Capitol Area Plan Housing Alternative, but would be mitigated to less-than-significant levels through design and direction of the panels. Although the Capitol Area Plan Housing Alternative would result less-than-significant impacts to aesthetics and light and glare, the additional housing units under this alternative would result in **greater** visual changes to the project site than the project.

7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because the No Project–No Development Alternative (described above in Section 7.4.1) would avoid all adverse impacts resulting from construction and operation of the 1215 O Street Office Building Project analyzed in Chapter 4, it is the environmentally superior alternative. However, the No Project–No Development Alternative would not meet the objectives the project as presented above in Section 7.2.

When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126[d][2]) require selection of an environmentally superior alternative from among the other action alternatives evaluated. As illustrated in Table 7-1, below, the Reduced Building Size/No Basement Excavation Alternative would be environmentally superior action alternative because although the environmental impacts would be similar to the proposed project, and no significant impacts or significant and unavoidable impacts would be completely avoided, the reduced degree of construction, excavation, and reduced building size would reduce the potential to encounter native soils that could contain cultural resources and reduce the emissions of criteria air pollutants and GHGs generated by the construction and operation of the project.

Table 7-1 Summary of Environmental Effects of the Alternatives Relative to the Proposed 1215 O Street Office Building Project

Environmental Topic	Proposed Project	Alternative 1: No Project - No Development Alternative	Alternative 2: Reduced Building Size/No Basement Excavation Alternative	Alternative 3: Capitol Area Plan Housing Alternative
Land Use	Less than Significant	Greater	Similar	Similar
Population, Employment, and Housing	Less than Significant	Similar	Less	Less
Transportation and Circulation	Less than Significant	Less	Similar	Greater
Utilities	Less than Significant with Mitigation	Less	Similar	Greater
Air Quality	Less than Significant with Mitigation	Less	Less	Greater
Greenhouse Gas Emissions and Climate Change	Less than Significant	Less	Less	Greater
Noise	Significant and Unavoidable	Less	Similar	Similar
Geology and Soils	Less than Significant	Similar	Similar	Similar
Hydrology and Water Quality	Less than Significant	Similar	Similar	Greater
Hazards and Hazardous Materials	Less than Significant	Less	Similar	Similar
Cultural Resources and Tribal Cultural Resources	Significant and Unavoidable	Less	Less	Greater
Biological Resources	Less than Significant with Mitigation	Similar	Similar	Similar
Public Services	Less than Significant	Less	Similar	Greater
Aesthetics/Light and Glare	Less than Significant with Mitigation	Less	Similar	Greater