

CHAPTER 4.0

ALTERNATIVES TO THE PROPOSED PROJECT

4.1 INTRODUCTION

This chapter reviews the range of alternatives that were considered in developing this EIR. The purpose of the alternatives analysis in an EIR is to describe a range of reasonable alternatives to the project that could feasibly attain most of the objectives of the Proposed Project, and to evaluate the comparative merits of the alternatives (CEQA *Guidelines*, Section 15126.6[a]).

Additionally, Section 15126.6 (b) of the CEQA *Guidelines* requires consideration of alternatives that could reduce to a less-than-significant level or eliminate any significant adverse environmental effects of the Proposed Project, including alternatives that may be more costly or could otherwise impede the Proposed Project's objectives. The range of alternatives evaluated in an EIR is governed by a "rule of reason", which requires the evaluation of alternatives "necessary to permit a reasoned choice". Alternatives considered must include those that offer substantial environmental advantages over the Proposed Project and may be feasibly accomplished in a successful manner considering economic, environmental, social, technological, and legal factors.

4.2 ALTERNATIVES ELIMINATED FROM CONSIDERATION

Two off-site alternatives, and two on-site alternatives were considered and were rejected from full EIR analysis because the alternatives would not fulfill the basic objectives of the project, would not be feasible, or would not reduce significant environmental impacts of the Proposed Project. The alternatives considered, but rejected, are briefly discussed below along with the reasons for rejection. Additionally, two project alternatives that are evaluated in this EIR are discussed in Section 4.3 below.

OFF-SITE ALTERNATIVES ELIMINATED

CEQA Guidelines Section 15126.6 (f) (2) specifically addresses the requirements for consideration of alternate locations. A pivotal consideration is whether any of the significant impacts of the Proposed Project would be avoided or substantially lessened by putting the Proposed Project at another location. If another location would not avoid or substantially lessen the environmental impacts associated with the proposed location, or if the alternate location would result in one or more significant adverse environmental effects in addition to those caused at the proposed location, then such alternate location may be rejected from further analysis in the EIR. If, during the scoping process for the EIR, the Lead Agency concludes that no feasible and environmentally superior alternate locations exist, the reasons for this conclusion must be briefly explained in the EIR.

Two off-site alternatives, Mather Air Force Base and North Natomas Regional Park were identified during the planning process.

Mather Air Force Base This site is located in an unincorporated area of Sacramento County 12 miles southeast of downtown Sacramento. The base, which closed in 1993, is currently being redeveloped for a variety of uses, including an airport/cargo depot, a prison reception area, commercial/office space, residential development, park, and a hospital.

North Natomas Regional Park This site is located near the corner of Del Paso Road and Natomas Boulevard within the North Natomas Community Plan Area of the City of Sacramento. The Master Plan for this Regional Park was adopted by the City Council on March 20, 2001.

ON-SITE ALTERNATIVES ELIMINATED

Research Zoo Alternative

The Research Zoo Alternative would be located on the existing Zoo grounds. Instead of focusing on the Zoo as a public attraction, the focus would shift to the research and wildlife conservation potential of the Zoo. The Zoo's involvement in conservation programs such as Species Survival Plans would increase, as would the Zoo's involvement with the UC Davis veterinary program. Improvements to the existing Zoo facilities would focus on these activities and maintaining AZA and USDA standards, a requirement of the Partnership Agreement (Section 3(A)). Improvements would include a veterinary clinic, additional holding/quarantine areas, kitchen, food storage and shop buildings. Current animal exhibits/enclosures would be updated on an as-needed basis with a focus on accommodating AZA and USDA standards, rather than a focus on providing a public attraction. Improvements that are orientated to the public, including a new entrance building, the sensory exhibit, and multi-use pavilion would not be constructed. The Zoo would continue to be open to the public as stipulated by the Partnership Agreement (Section. 3(B)).

Expanded Zoo

The Expanded Zoo Alternative would occupy the existing Zoo grounds as well as two adjacent areas of William Land Park. The Zoo boundaries would expand north to 15th Avenue replacing the currently existing formal gardens with animal exhibits. The Zoo would also expand to the southeast to include approximately 4 acres at the corner of Land Park Drive and Sutterville Road. This alternative would include all of the elements of the Proposed Project as well as provide additional space for exhibits and facilities, a parking garage and a pedestrian bridge. A partially below grade, two-level parking garage would be constructed on 16th Avenue directly north of Funderland to provide 124 off-street spaces. A pedestrian bridge would be constructed from the entrance building across Land Park Drive to provide safer access from the parking garage, Funderland and Fairytale Town. Exhibits and facilities would be designed to incorporate and preserve existing vegetation to the greatest extent that is feasible. The parking garage would be largely screened by vegetation and animal enclosures. The pedestrian bridge would provide an architecturally pleasing gateway to the park. In general, the Zoo would maintain its current visual character; all existing City Street and Heritage Trees would be retained.

COMPARISON OF ALTERNATIVES ELIMINATED

Based on the requirements of CEQA, the following screening criteria was used to review potential off-site locations:

1. Attainment of the Basic Objective of the Project,
2. Comparative Environmental Impacts, and
3. Feasibility.

Below is an analysis of the recommended off-site alternatives compared to the screening criteria:

Attainment of the Basic Objectives of the Project: The off-site locations and the on-site alternatives were evaluated in light of the identified project objectives (Chapter 3.0). This evaluation is being conducted as an alternative screen to assure that the alternatives meet the intent of CEQA Section 15126.6(a).

- Establish the Zoo as a premier visitor attraction in the Sacramento region focused on the quality of visitor experience and managed attendance by encouraging year round use of the Zoo.
- Provide updated facilities necessary for continued accreditation with the American Zoo and Aquarium Association (AZA).
- Provide an on-site animal hospital for the enhanced care of the animal collection and to partner with the UC Davis Veterinary Residency program.

One of the critical criteria applied in this screening is that the project provides updated facilities necessary for continued accreditation with the AZA. Without AZA accreditation, the Zoo will be limited in its ability to partake in exchange programs with other zoos and to develop or host other vital programs and exhibits.

Off-Site Alternatives. The Partnership Agreement stipulates that the Zoological Society update the *Zoo – 2002 Master Plan*, and that the master plan revision “focus on improving Zoo operations within the existing Zoo boundaries” (Partnership Agreement, Section. 11(B)). The Zoological Society is obliged by the terms of this agreement to maintain the existing Zoo grounds; an alternative site would need to be considered as an *additional* project, rather than an alternative project site. An alternative site would therefore not attain the critical objective of updating facilities to maintain AZA accreditation.

Research Zoo Alternative. Under the Research Zoo Alternative, public visitation is projected to decrease over the next 10 years, as public-orientated exhibits are replaced with research and conservation orientated facilities. This would not fulfill the objective of establishing the Zoo as a premier visitor attraction. Additionally, as visitation decreases over the next 10 years, the Zoo’s revenue would also decrease due to a loss in entrance fee income. This would limit the Zoo’s ability to provide needed improvements to maintain AZA accreditation.

Expanded Zoo. This alternative would meet all of the project objectives. However, as noted above, the Partnership Agreement stipulates that the master plan revision focus on improvements within the existing Zoo boundaries.

Comparative Environmental Impacts: Each of the two off-site locations and the on-site alternatives were evaluated for impacts on the following: 1) contribution to parking impacts; 2) impacts to Heritage Trees; and 3) new or other types of significant adverse environmental impacts.

Off-Site Alternatives.

Contribution to Parking Impacts. Development of the project at the alternatives sites would require the provision of adequate parking facilities. It is assumed that a zoo located at either the North Natomas or Mather AFB sites would incorporate adequate parking space within the facility plans. Therefore parking impacts at alternative sites would be not be significant.

Impacts to Heritage Trees. Development of the project at the alternative sites would avoid, to the extent practicable, impacts to known Heritage Trees. Site design and layout would assure that impacts to Heritage Trees would not be significant.

Additional Impacts Not Associated with the Project Site. Additional impacts may result if the project were developed at Mather Air Force Base (AFB). These include noise impacts from the existing use of the airfield, and land use inconsistencies with current and planned redevelopment projects. These impacts could be reduced significantly by locating the project within the portion of the AFB leased by Sacramento County as a regional park.

Development of either off-site alternative would result in more site disturbance of vacant land than the Proposed Project. Given that a significant portion of yearly operating revenue comes from gate receipts, a significant portion of the new zoo would need to be constructed during the first phase so that revenue generation could begin. This would result in greater site disturbance of vacant land to accommodate the facilities and the associated infrastructure improvements. Construction related air quality, noise and traffic impacts would be greater than the Proposed Project.

Research Zoo Alternative.

Contribution to Parking Impacts. Development of this alternative would result in parking impacts similar to that of the Proposed Project. However, parking impacts would not be of a similar magnitude, as fewer Zoo visitors are expected. Parking impacts would be similar or less than that which is currently experienced.

Impacts to Heritage Trees. Development of this alternative would result in impacts similar to that of the Proposed Project. New facilities can be expected to result in impacts to Heritage Trees such as trimming, soil disturbance or removal. Impacts to Heritage Trees would be similar in magnitude in relation to the Proposed Project.

Additional Impacts Not Associated with the Project Site. Impacts associated with the Research Zoo Alternative would be generally similar in scope and magnitude as the Proposed Project. However, visual impacts of facility development could be greater, as the focus of the Zoo would be on providing adequate research and conservation facilities rather than providing an aesthetically pleasing setting for visitors.

Expanded Zoo.

Contribution to Parking Impacts. Development of this alternative would result in the development of a 124-space parking garage directly north of Funderland. This parking garage would alleviate some of the parking impacts in the project area. Therefore, parking impacts would be less than that which is expected to occur as the result of the Proposed Project.

Impacts to Heritage Trees. Development of this alternative would result in impacts similar to that of the Proposed Project. New facilities can be expected to result in impacts to Heritage Trees such as trimming, soil disturbance or removal. Impacts to Heritage Trees would be similar or greater in magnitude in relation to the Proposed Project.

Additional Impacts Not Associated with the Project Site. The expansion of the Zoo would impact other uses of William Land Park. Impacts would be most significant in regards to the loss of the formal gardens north of the Zoo on 15th Avenue, and the section of William Land Park that would be converted to Zoo grounds. Although retaining existing vegetation and a general park-like setting, the park areas converted to Zoo grounds would no longer be “open space” available for a variety of public uses. As an established park with a history of associated uses, the dedication of additional parkland would reduce the aesthetic and recreational amenities that the surrounding community has come to rely upon. Additionally, the construction of the parking garage would result in an aesthetic impact to the visual setting of William Land Park as well as increased construction-related noise and air quality impacts.

Feasibility: Consistent with the feasibility criteria deemed appropriate for consideration in CEQA *Guidelines* Section 15126.6 (f)(1), each of the off-site locations were evaluated in light of the following feasibility factors. 1) Plan or Regulatory Limitations, and 2) Ability of the proponent to acquire, control or otherwise have access to the alternative site.

Off-Site Alternatives.

Plan or Regulatory Limitations. The Partnership Agreement with the City stipulates that the Zoological Society update the *Zoo – 2002 Master Plan*, and that the master plan revision focus on improving Zoo operations within the existing Zoo boundaries. The Zoological Society is obliged by the terms of this agreement to maintain the existing Zoo grounds.

Ability to Acquire the Alternative Site. The Zoological Society has expressed a financial inability commit to improvements needed to maintain AZA and USDA

standards at the existing Zoo grounds as well as undertake an additional project (Mary Healy, pers. comm.). The off-site alternatives would also result in significantly more upfront financial commitment than the Proposed Project. The fees associated with the reconfiguration of uses under the Proposed Project are based on the success of fund raising programs implemented by the Zoological Society. Therefore, improvements under the Proposed Project will occur over time as funds become available. The development of a new zoo would necessitate a significant capital expenditure that is not currently identified or available. Given that the yearly funding of Zoo operations occurs in great part from gate receipts, a significant portion of a new zoo would need to be constructed in the first phase so that revenue generation could begin immediately. Neither the City nor the Zoological Society has the funds to construct a new zoo. In fact, the Partnership Agreement makes it clear that the City and Zoological Society plan to maintain the facility in its current location.

Research Zoo Alternative.

Plan or Regulatory Limitations. The Zoo relies on entrance fees for a substantial part of its budget. However, under the Research Zoo Alternative, public visitation is projected to decrease over the next 10 years, as public-orientated exhibits are replaced with research and conservation orientated facilities. While the cost of replacing exhibits with research-orientated facilities is expected to be less than that for public-orientated facilities, the Zoo's revenue would also decrease due to a loss in entrance fee income. It is not anticipated that the Zoological Society would be able to undertake currently identified improvements to the Zoo to maintain AZA and USDA standards as required by the Partnership Agreement, and undertake future improvements with a reduction of entrance fee revenue.

Ability to Acquire the Alternative Site. The Research Zoo would be located within the existing Zoo boundaries; acquisition of additional property would not be required.

Expanded Zoo.

Plan or Regulatory Limitations. As stated above, the Partnership Agreement with the City stipulates that the master plan revision focus on improving Zoo operations within the existing Zoo boundaries. The Zoological Society is obliged by the terms of this agreement to maintain the existing Zoo boundaries.

Ability to Acquire the Alternative Site. The Partnership Agreement limits the Zoological Society's ability to expand the Zoo's boundaries to include adjacent areas of William Land Park.

Summary of Reasons for Rejecting the Alternative Sites from Further Evaluation as a CEQA Alternative.

Off-Site Alternatives.

While these two off-site alternatives were considered, they have been eliminated from consideration due to the Zoological Society's commitments to the existing Zoo grounds.

The Zoological Society is obliged by the terms of the Partnership Agreement to maintain the existing Zoo grounds. The Zoological Society has expressed an inability commit funds for improvements needed to maintain AZA and USDA standards at the existing Zoo grounds as well as undertake an additional project. An alternative site is considered to be infeasible and, therefore, are eliminated from further review within this EIR.

Research Zoo Alternative.

While the Research Zoo Alternative was considered, it has been eliminated from consideration due to feasibility concerns. The ability of the Zoological Society to operate the Zoo as a research facility is not considered feasible due to the stipulations of the Partnership Agreement and the reliance of the Zoo's operations on entrance fee revenue.

Expanded Zoo.

This Alternative has been eliminated from consideration due to land use consistency feasibility, and additional environmental concerns. The expansion of the Zoo would impact other uses of William Land Park. Additionally, the Partnership Agreement stipulates that the master plan revision focus on improving Zoo operations within the existing Zoo boundaries. The expanded zoo would also result in greater construction (air quality and noise) and operation (parking, transportation, and visual) impacts than the Proposed Project.

4.3 ALTERNATIVES EVALUATED IN THIS EIR

ALTERNATIVE A: NO PROJECT ALTERNATIVE (AA)

As required by Section 15126.6(e) of the CEQA *Guidelines*, the No Project Alternative must be evaluated as part of the EIR. The purpose in addressing the No Project Alternative is to allow decision makers the ability to compare the impacts of the Proposed Project versus no project.

The existing condition portion of the No Project Alternative includes the environmental conditions that exist at the time that the environmental analysis is commenced (CEQA *Guidelines*, 15126.6(e)(2)). The No Project Alternative assumes no development for existing plus project conditions. The medical/service complex, multi-use pavilion north of Victoria Lake, additions to the Kampala Center, and picnic pavilion assumed under Phase I of the Proposed Project are not assumed to be constructed under the No Project Alternative.

According to the CEQA Guidelines, the No Project Alternative shall discuss what would reasonably be expected to occur in the *foreseeable future* if the project were not approved (15126.6(e)(2)). Future improvements assumed for the No Project Alternative include a proposed 5,300 square foot health care facility that would contain space for surgery, x-rays, quarantine, storage and office space. The proposed facility, as identified in *Zoo – 2002* (pg. 117), would be located directly southeast of the current administration building. This facility would likely be constructed under the No Project Alternative as a response to current AZA requests for the development of veterinary and quarantine facilities.

ALTERNATIVE B: REDUCED INTENSITY ALTERNATIVE (AB)

The Reduced Intensity Alternative would be located within the existing Zoo grounds. Under this alternative, improvements to the Zoo would consist primarily of those required to assure AZA and USDA standards are maintained; however, other improvements to zoo facilities would be undertaken.

As the Zoo will be subject to AZA and USDA reviews in the future, all specific improvements cannot be determined at this time. For purposes of this analysis, initial (*Phase I* or *short-term*) developments consist of the medical/service center improvements assumed under the Proposed Project. The other Phase I improvements identified for the Proposed Project (i.e., Kampala Center and north lawn improvements) will not be constructed under this Alternative.

Other long term, programmatic improvements assumed under this alternative include replacing or renovating dilapidated exhibits and holding areas to assure animal health, and providing adequate facilities to provide for the care and maintenance of the Zoo's animal collection. An administration building would also be included in this alternative to provide additional staff office space and education classrooms (within the medical/service area of the Zoo). However, a number of long term, programmatic improvements included in the Proposed Project would not be included under this alternative. Notably, the multi-use pavilion (north lawn), new entrance building, below grade parking garage, and eight new theme exhibit centers would not be constructed.