
VI. ALTERNATIVES TO THE PROPOSED PROJECT

The State CEQA Guidelines require that EIRs include the identification and evaluation of a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the project while still meeting the general project objectives. The State CEQA Guidelines also set forth the intent and extent of alternatives analysis to be provided in an EIR. Those considerations are discussed below.

Alternatives to the Proposed Project

Section 15126.6(a) of the CEQA Guidelines states: *“An EIR shall 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 comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which 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.”*

Purpose

Section 15126.6(b) of the CEQA Guidelines states: *“Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, 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 project objectives, or would be more costly.”*

Significant Project Impacts

The project impacts that would remain significant and unavoidable after mitigation include the following:

- Air Quality and Greenhouse Gas Emissions – a) Grading/Construction Impacts, b) Operation Period GHG Emissions
- Noise – a) Cumulative Traffic Noise Levels
- Transportation and Traffic – a) Existing Plus Project Intersection Operation Impacts at East Washington Street/North McDowell Boulevard, b) Existing Plus Project Vehicle Queuing Impacts at East Washington Street/North McDowell Boulevard, Southbound Right-turn Lane; c) Existing Plus Pipeline Plus Project Intersection Operation Impacts at Corona Road/North McDowell Boulevard, Corona Road/Petaluma Boulevard North and

East Washington Street/North McDowell Boulevard, d) Existing Plus Pipeline Plus Project Vehicle Queuing Impacts, e) Existing Plus Pipeline Plus Project Freeway Operation Impacts, f) Cumulative Plus Project Intersection Operation Impacts at Rainer Avenue/North McDowell Avenue and Rainer Avenue/Project Access and Corona Road/North McDowell Boulevard, g) Cumulative East Washington Street/North McDowell Boulevard, Southbound Right-turn Lane Vehicle Queuing Impacts, and h) Cumulative Freeway Operation Impacts

The project impacts that would be less than significant after mitigation include the following:

- Geology/Soils – a) Strong Seismic Ground Shaking, b) Geologic and Soil Instability, c) Soil Erosion/Loss of Topsoil, and d) Exposure to Geologic Hazards
- Hydrology/Water Quality – a) Storm Water Quality
- Biological Resources – a) Special-Status Species and b) Jurisdictional Waters
- Noise – a) Temporary Increases in Noise Levels
- Transportation and Traffic – a) Design Features (Vehicular Site Access, Internal Circulation) at North McDowell Boulevard Right-turn Access Driveways, Rainer Avenue Extension, Lynch Creek Way, and Professional Drive – Project Driveway, b) Non-motorized Transportation (pedestrian and bicycle), c) Emergency Access Impacts, d) Cumulative Plus Project Intersection Operation Impacts at Rainer Avenue/Maria Drive, and e) Site Access a various locations
- Public Services – a) Fire Protection and b) Other Public Facilities
- Cultural Resources – a) Archaeological Resources

Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the CEQA Guidelines states: *“The range of potential alternatives to the proposed 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. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”*

Project Objectives

As stated above, the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project. The objectives of the proposed project are as follows:

- Construct a 344,000 square foot infill development exhibiting quality of design, consistency with the designated land use and zoning, and compatibility with the surrounding land uses.
- Satisfy the substantial demand for regional and neighborhood retail, office, fitness, and dining experiences in the Petaluma trade area.
- Address the City of Petaluma's retail leakage issues by providing retail service options, particularly in the area of general merchandise and home improvement/lumber sales, within the City's trade area.
- Provide retail options that will generate long-term sales tax revenue to the City's General Fund.
- Enhance and amenitize the Deer Creek swale area which bisects the project site, into a pedestrian and bicycle-oriented gathering place while rehabilitating the natural biotic communities within this natural corridor.
- Provide new public open space, gathering places and pedestrian and bicycle -oriented amenities in accordance with the policies and land use objectives of the City's Pedestrian and Bicycle Plan.
- Generate local employment opportunities, both in short-term construction employment, and long-term project employment.
- Provide an attractive urban face along North McDowell Boulevard, in accordance with the General Plan 2025 policies for the North McDowell Planning Subarea.
- Provide linkage with the City's pedestrian and bicycle trail network along North McDowell Boulevard.

Overview of Selected Alternatives

The alternatives to be analyzed in comparison to the proposed project include:

Alternative A: No Project Alternative

Alternative B: Reduced Project Alternative

Alternative C: Commercial and Residential Care Project Alternative

Alternatives Considered but Rejected as Infeasible

As described above, Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible for detailed study, and briefly explain the reasons underlying the lead agency's determination. Furthermore, Section 15126(f)(1) states that "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...and whether the proponent can reasonably acquire or control or otherwise have access to the alternative site. No one of these factors established a fixed limit on the scope of reasonable alternatives."

Immediately upon submittal of the project application, the City began considering a variety of alternatives to meet the applicant's goals and objectives. A number of alternative project scenarios were explored and ultimately rejected based on criteria including feasibility, environmental impacts, and ability to meet the applicant's goals and objectives. The alternatives that were considered but rejected for further analysis are discussed below.

Industrial Use Alternative

An alternative including industrial uses on the project site, including the various Industry, Manufacturing & Processing uses permitted within the MU-1B zone, was dismissed because it would not meet the objectives of the proposed project and it would not necessarily avoid or substantially lessen significant impacts of the proposed project. In addition, it would not address the City's problem of retail leakage as outlined in numerous General Plan goals and policies, and would not provide the mix of retail, office, and recreational uses as proposed with the project.

Open Space Park/Community Center Alternative

An open space or park alternative with a community swimming pool was suggested by one public comment during the EIR Notice of Preparation review period but was rejected as financially infeasible because no funding was identified for purchase and/or development of the site as a community open space or recreation site, and also because it would not meet most project objectives. Particularly, it would not meet the project objectives of stemming retail leakage, providing long-term sales tax and net revenue to the General Fund that the mixture of proposed project uses would generate. It also would not provide employment opportunities in short-term construction and long-term operation to the same extent as the proposed project.

Off-Site Alternative

An alternative involving an alternate project site was also rejected as being infeasible because a site with similar requirements to develop the proposed project (i.e., size of site, site zoning,

available access) is not available within the City of Petaluma. Therefore, even if the applicant were able to acquire an alternate site, which is not demonstrated, a project on an alternate site outside of the City's jurisdiction is not capable of being accomplished in a successful manner within a reasonable period of time because of delays and uncertainty, and because the City lacks the authority to approve such a project.

Reduction of Traffic Impacts to Less-than-Significant Alternative

An alternative that would reduce all project-related significant traffic impacts to less-than-significant levels was rejected for further study because it would require an 80-90% decrease in total vehicle trips generated by the project. In terms of square footage, such an alternative would roughly mean removing all of the proposed project buildings except for the office buildings. The City's General Plan has designated this site for mixed use development, envisioning commercial development, at least in part. A statement of overriding considerations was adopted for the General Plan 2025 EIR where the City accepted that certain significant and unavoidable impacts, including traffic impacts, traffic noise and air quality impacts, are outweighed by benefits to the community from the type of development proposed in the General Plan, at the densities permitted by the General Plan. In addition, removal of 80-90% of the proposed buildings would make the project economically infeasible and would not meet the basic objectives of the project in regard to addressing retail leakage, generating net revenue and creating the same degree of employment opportunities.

Traditional Mixed-Use Alternative

The 2025 General Plan land use designation for the project site is Mixed-Use, which supports a variety of uses, including retail, specific types of residential, service commercial, and offices. Uses allowed under the existing zoning for the site are shown in Table III-1. As shown in Table III-1, a traditional mixed-use alternative involving attached residential uses above retail and office uses is not permitted within the Mixed Use 1B Zone (MU-1B). Based on this zoning, the only types of residential uses permitted at the project site include residential care facilities and work/live residential uses. The project site's proximity to Highway 101 further constrains the ability to include residential uses on-site as the California Air Resources Board recommends avoiding siting of new sensitive land uses within 500 feet of a freeway. For these reasons a mixed-use alternative involving residential uses on the second floor of retail or office was also rejected as being infeasible.

Clustered Commercial/Residential Project Alternative

As described above, due to the site's MU-1B zoning a traditional mixed-use alternative with commercial and residential uses is not permitted on the project site. As such, a recommended clustered alternative which redesigns the project consistent with the downtown "SmartCode®"¹

¹ The City's application of the SmartCode® design only applies to the properties within the Central Petaluma Specific Plan boundaries.

concept, which provides for a broader mix of uses, including housing, was rejected as being infeasible. Such an alternative would require a zone change for the site, whereas the proposed project does not require any changes to existing on-site zoning.

Proposed Project with Underground or Above-Ground Parking Structure

An alternative involving a subterranean parking structure was rejected as infeasible due to the height of the groundwater table, which was encountered in borings at depths of 10.5 feet to 18.0 feet below ground surface. An alternative involving an above-ground parking structure(s) in-lieu of or in addition to surface parking was dismissed because of aesthetic concerns relating to the views from North McDowell Boulevard, height limitations in the MU-1B zoning district, and the limitations a parking structure would place on location of bio-swales, landscaping, and related “heat-island” mitigation.

Assumptions and Methodology

The anticipated means for implementation of the alternatives can influence the assessment and/or probability of impacts for those alternatives. For example, a project may have the potential to generate significant impacts, but considerations in project design may also afford the opportunity to avoid or reduce such impacts. The alternatives analysis is presented as a comparative analysis to the proposed project and assumes that all applicable mitigation measures proposed for the project would apply to each alternative. The following alternatives analysis compares the significant environmental impacts of three alternatives with those of the proposed project for the environmental topics analyzed in detail in the Initial Study (see Appendix A) and Section IV.B (Transportation and Traffic) and Section IV.C (Air Quality and Greenhouse Gas Emissions) of the Draft EIR.

A. NO PROJECT ALTERNATIVE

As required by CEQA, this subsection analyzes a “No Project” Alternative (Alternative A). Because the proposed project is for specific development of an individual site that does not require a General Plan or zoning amendment, the “No Project Alternative” evaluates a “no build” scenario. CEQA Guidelines section 15126.6(e)(3)(B).

Under Alternative A, the proposed project would not be constructed, and the project site would remain in its current undeveloped condition. The analysis of Alternative A assumes the continuation of existing physical conditions on the site, as well as development of the related projects described in Section III.B (Related Projects). The potential environmental impacts associated with Alternative A are described below and are compared to the significant environmental impacts associated with the proposed project.

Geology/Soils

Since no grading would take place under Alternative A, grading impacts would be less than the proposed project. The project site would still be subjected to ground shaking and related seismic hazards. However, no new employees or customers would visit the site under this alternative, whereas the project would substantially increase site usage. While the project’s significant geology and soils impacts can be completely mitigated, there would be no geology and soils impacts associated with Alternative A.

Air Quality and Greenhouse Gas Emissions

No grading or construction would occur under Alternative A and no new vehicle trips would be generated. In addition, no air pollutant emissions (i.e., respirable particulate matter [PM₁₀], carbon monoxide [CO], nitrogen oxides [NO_x]) related to grading, construction or mobile trips would be generated under this alternative. Overall, no air quality or greenhouse gas emissions impacts would occur under Alternative A. Construction air quality impacts and operational greenhouse gas emissions associated with the proposed project were found to be significant and unavoidable.

Hydrology/Water Quality

Under Alternative A, the project site’s drainage patterns would not change and no grading or development of impermeable surfaces would occur. Non-point source water quality impacts associated with Alternative A would be less compared to the proposed project because this alternative would not introduce new buildings or parking lots on the site. While the project’s significant impacts related to water quality can be mitigated to less-than-significant levels, Alternative A would result in no impacts to hydrology and water quality.

Biological Resources

Because the project site would not be developed under Alternative A, no trees or vegetation would be removed from the site. Also, the existing wetlands on the site would be preserved under this alternative. Thus, Alternative A would have no impacts related to the special-status wildlife species, sensitive natural communities, tree preservation, wetlands, and nesting birds. While the project's significant biological resources impacts can be fully mitigated, biological resources impacts would still be less under Alternative A compared to the proposed project.

Noise

Alternative A would not involve any grading or construction. Therefore, no noise impacts that are typically associated with grading or construction would occur from this alternative. Likewise, since no new development or associated traffic would occur under Alternative A, there would be no increase in noise levels typically associated with the long-term operation of new development projects. The potentially significant construction noise impacts associated with the proposed project can be mitigated to less-than-significant levels. The project would result in less than significant operational noise impacts; however, the project's cumulative traffic noise impacts would be significant and unavoidable. Overall, noise impacts from Alternative A would be less than the proposed project.

Transportation and Traffic

Under Alternative A, no development on the project site would occur. As such, no new traffic trips would be generated, whereas the proposed project would generate approximately 10,155 new daily vehicle trips, which include 371 a.m. peak hour trips, 985 p.m. peak hour trips, and 1,244 weekend midday peak hour trips. Therefore, overall direct traffic impacts from Alternative A would be less than the proposed project and would be less than significant. Similarly, a No Project Alternative would not make a considerable contribution to cumulatively significant impacts, including those identified as such in the General Plan 2025 EIR.

However, the No Project Alternative would not provide a Class I path along the proposed project frontage, would not provide roadway improvements to the Rainier Avenue Extension, nor would it replace the existing sidewalk along the project frontage on North McDowell Boulevard or signalize the intersection of Professional Drive/North McDowell Boulevard. In addition, the No Project Alternative would not contribute to the City's traffic mitigation fee for cumulative project improvements.

Public Services (Fire Protection and Other Public Facilities)

As no new development would occur under Alternative A, it would not change the existing demand for fire and emergency services. Therefore, no fire protection impacts would occur under Alternative A. While the project's significant fire protection impacts can be fully mitigated, fire protection impacts from Alternative A would be less than the proposed project. Similarly,

Alternative A would result in no impacts associated with roadway usage from trucks (i.e., potential degradation of roadways from trucks), whereas the proposed project would result in less than significant impacts after mitigation related to road usage.

Cultural Resources

Under Alternative A, no ground-disturbing activities would occur. Alternative A would not have the potential to damage or destroy known and unknown historic and prehistoric archaeological resources. While the project's significant cultural resources impacts can be fully mitigated, cultural resources impacts associated with No Project Alternative would be less than those associated with the proposed project. No impacts to cultural resources would occur under Alternative A.

Relationship of the Alternative to the Project Objectives

Alternative A would not meet any project objectives. The No Project Alternative would not address the City's retail leakage needs, particularly in the home improvement category which is the focus of numerous policies and goals in the City's General Plan 2025, and would not generate long-term fiscal revenue to the City's General fund or provide either short-term or long-term employment from construction and project retail and commercial operations.

B. REDUCED PROJECT ALTERNATIVE

Under Alternative B (Reduced Project Alternative), the proposed project has been developed to reduce the potential traffic impacts by 25 percent, accomplished by reducing the number of new vehicle trips during the weekday p.m. peak hour by 25 percent. This alternative has the same square footage for the proposed major retail anchor and offices as the proposed project; however, the total additional retail, restaurant, and fitness facility uses have been reduced by approximately 50 percent of this project component, to 87,500 square feet from the proposed 174,170 square feet. The total project square footage under this alternative would be reduced approximately 25.4 percent, from 343,998 to 256,498 square feet.

As a result of the square footage reduction, Alternative B would include additional green space near the Deer Creek buffer, North McDowell Boulevard, and the proposed restaurants and shops. The buffer along Deer Creek would also be widened on both sides of the creek. The proposed location of the major retail anchor (home improvement store) would be shifted to the north slightly, thereby creating a larger buffer between the major retail anchor and nearby off-site office uses to the south. The remaining office, retail, restaurant, and fitness facility would be clustered along North McDowell Boulevard. The remainder of the site plan, as well as building heights, would be similar to the proposed project. The potential environmental impacts associated with Alternative B are described below and are compared to the significant environmental impacts associated with the proposed project.

Geology/Soils

The project site would still be subjected to ground shaking and related hazards under both Alternative B and the proposed project. Compliance with the Uniform Building Code and geotechnical report recommendations would ensure that no significant earth resource impacts would be created under this alternative. Earth resources impacts associated with Alternative B would be similar to those associated with the proposed project. These impacts can be mitigated to less-than-significant levels via the mitigation measures listed in Table II-1 and included in the Initial Study (Appendix A).

Air Quality and Greenhouse Gas Emissions

Short-term air quality impacts during grading for Alternative B would be similar to the proposed project as roughly the same amount of grading would be required. These impacts would be significant and unavoidable for both Alternative B and the proposed project. However, air quality impacts during construction would be slightly less under this alternative than the proposed project because the Reduced Intensity Alternative involves 25 percent less development. Long-term operational air quality impacts from stationary emissions would also be less under this alternative compared to the proposed project. This is because Alternative B involves 87,500 fewer square feet of development, resulting in less natural gas and electricity consumption and associated air pollution than the proposed project. Likewise, Alternative B

would generate roughly 25 percent fewer vehicle trips per day than the proposed project, meaning that long-term automobile-related air pollutant emissions would be less than the proposed project. Operational air quality emissions associated with both Alternative B and the proposed project would be less than significant. However, impacts associated with operational greenhouse gas emissions would remain significant and unavoidable for both Alternative B and the proposed project.

Hydrology/Water Quality

Alternative B contains 87,500 fewer square feet of development compared to the proposed project and less impermeable surfaces on the project site. Water quality impacts associated with Alternative B would be similar to those associated with the proposed project due to mandatory compliance with the City of Petaluma's Phase II National Pollutant Discharge Elimination System Storm Water Management Plan.

Biological Resources

The development of Alternative B would change the building layout of project uses, but it would not significantly alter the amount of site preparation and grading activities that would be required. As with the proposed project, site preparation and grading activities under Alternative B would require the removal of the existing vegetation that is located on the project site (with the exception of vegetation within Deer Creek and the area reserved for the Rainier Avenue off-ramp). Sensitive species such as black-shouldered kite and loggerhead shrike could potentially use the project site. Construction and operation activities under Alternative B and the proposed project have the potential to impact these species. These impacts are similar to those identified under the proposed project, and can be completely mitigated by implementing the mitigation measures listed in Table II-1 and included in the Initial Study (Appendix A).

Noise

Under Alternative B, noise impacts during grading would be similar to the proposed project because roughly the same amount of grading would be required. Noise impacts during construction would be slightly less than the proposed project because Alternative B includes 87,500 fewer square feet of development. Similar to the proposed project, grading and construction noise impacts associated with Alternative B would be less than significant after mitigation. Also, Alternative B would generate roughly 25 percent fewer vehicle trips per day than the proposed project; thus, long-term automobile-related noise impacts would be less than the proposed project and also less than significant. However, cumulative traffic noise impacts from both Alternative B and the proposed project would remain significant and unavoidable.

Transportation and Traffic

Alternative B consists of 87,500 fewer square feet or 25 percent less commercial uses than the proposed project. As a result Alternative B would generate fewer net average daily trips and

peak hour trips when compared to the proposed project. The Reduced Project Alternative is anticipated to generate an average of 7,626 new daily vehicle trips, including 310 trips during the morning peak hour, 739 trips during the evening peak hour, and 943 trips during the weekend midday peak hour. Overall, traffic impacts associated with Alternative B would be less than those associated with the proposed project; however, this alternative would not substantially lessen the project's significant traffic impacts. The various significant and unavoidable traffic impacts associated with the proposed project would still be significant and unavoidable under Alternative B (refer to Table VI-1 for a list of the significant and unavoidable traffic impacts associated with the proposed project and Alternative B).

Public Services (Fire Protection and Other Public Facilities)

Alternative B would result in less of a demand for fire protection and emergency services provided by the Petaluma Fire Department because it would consist of 87,500 fewer square feet and would generate approximately 25 percent fewer employees than the proposed project. This alternative is also anticipated to attract fewer patrons or visitors on a daily basis compared to the proposed project given its reduced size. As with the proposed project, Alternative B would result in significant fire protection impacts related to response times; however, these impacts can be mitigated to less-than-significant levels with the emergency vehicle pre-emption provided as part of the new traffic signal required at Professional Drive/North McDowell Boulevard. Also, with an approximate 25 percent reduction in square footage under Alternative B, roadway usage impacts (i.e., potential degradation of roadways from trucks) for this alternative would be less than those associated with the proposed project as fewer truck trips would be required. Potentially significant roadway usage impacts associated with the proposed project and Alternative B can be reduced to less-than-significant levels.

Cultural Resources

Under Alternative B, cultural resource impacts would be similar to the proposed project because roughly the same amount of grading would be required. Therefore, should the site contain unknown archaeological resources, implementation of Alternative B would result in similar cultural resource impacts compared to the proposed project. These impacts can be mitigated to less-than-significant levels via the mitigation measures listed in Table II-1 and included in the Initial Study (Appendix A).

Relationship of the Alternative to the Project Objectives

Alternative B would meet most of the project objectives, although to a lesser degree for economic objectives. This alternative would still provide the same square footage for the primary home improvement retail anchor tenant, and thus address the City's retail leakage in this sector, and would still provide local employment opportunities and net fiscal revenues to the City's General Fund. The leakage reduction, employment opportunities, and net fiscal General Fund revenue would be reduced proportionally to the reduction in retail/commercial square footage.

C. COMMERCIAL AND RESIDENTIAL CARE PROJECT ALTERNATIVE

Under Alternative C (Commercial and Residential Care Project Alternative), as with the Reduced Project Alternative, the square footage for the major retail anchor (home improvement store) and office would remain unchanged compared to the proposed project. However, the remaining retail anchors (Majors 2, 3 and 4 totaling 69,000 square feet) would be replaced with a 50-bed residential care facility for the elderly under Alternative C, thus providing a broader range of permitted uses compared to the proposed project.

The residential care facility for the elderly would be located near the proposed medical offices at the southeastern edge of the project site, more than 500 feet east of Highway 101. As permitted by the MU-1B zoning, this facility would be behind ground floor street fronting uses along North McDowell Boulevard. The proposed location of the major retail anchor (home improvement store) would be shifted to the north in the general location of the proposed project's Majors 2, 3 and 4, thereby creating a larger buffer between the major retail anchor and nearby off-site office uses to the south, and a greater distance from the residential care facility. The remainder of the site plan, as well as building heights, would be similar to the proposed project. The potential environmental impacts associated with Alternative C are described below and are compared to the significant environmental impacts associated with the proposed project.

Geology/Soils

Geology and soils impacts associated with Alternative C would be similar to those associated with the proposed project. This is because both Alternative C and the proposed project involve roughly the same amount of development that would be exposed to seismic hazards. Compliance with the Uniform Building Code and geotechnical report recommendations would ensure that no significant geological impacts would be created under this alternative or the proposed project.

Air Quality

Short-term air quality impacts during grading and construction for Alternative C would be similar to the proposed project, which were found to be significant and unavoidable. Operational air quality emissions associated with both Alternative C and the proposed project would be less than significant. However, impacts associated with operational greenhouse gas emissions would remain significant and unavoidable for both Alternative C and the proposed project.

Hydrology/Water Quality

Alternative C would provide a similar amount of impermeable surface on the project site compared to the proposed project. Water quality impacts associated with Alternative C would be similar to those associated with the proposed project. Overall, significant water quality impacts associated with the proposed project and Alternative C can be completely mitigated.

Biological Resources

The amount of site preparation and grading activities that would be required under Alternative C would be similar to the proposed project. Site preparation and grading activities under Alternative C would require the removal of the existing vegetation that is located on the project site (with the exception of vegetation within Deer Creek and the area reserved for the Rainier Avenue off-ramp). Construction and operation activities under Alternative C and the proposed project have the potential to impact sensitive species such as black-shouldered kite and loggerhead shrike. These impacts are similar to those identified for the proposed project, and can be completely mitigated by implementing the mitigation measures listed in Table II-1 and included in the Initial Study (Appendix A). Therefore, biological resources impacts associated with Alternative C would be similar compared to the proposed project, although the project's significant biological resources impacts can be reduced to a less-than-significant level.

Noise

Grading and construction noise impacts associated with the proposed project and Alternative C would be significant but these impacts can be reduced to less-than-significant levels via implementation of recommended mitigation measures. Alternative C, however, would generate fewer vehicle trips per day than the proposed project; thus, long-term automobile-related noise impacts would be less than the proposed project, which were found to be less than significant. However, cumulative traffic noise impacts from both Alternative C and the proposed project would remain significant and unavoidable.

Transportation and Traffic

The Commercial and Residential Project Alternative is anticipated to generate an average of 7,442 additional new daily vehicle trips, including 296 trips during the morning peak hour, and 702 trips during the evening peak hour. Overall, traffic impacts associated with Alternative C would be less than those associated with the proposed project; however, this alternative would not substantially lessen the project's significant traffic impacts. The various significant and unavoidable traffic impacts associated with the proposed project would still be significant and unavoidable under Alternative C (refer to Table VI-1 for a list of the significant and unavoidable traffic impacts associated with the proposed project and Alternative B).

Public Services (Fire Protection and Other Public Facilities)

The proposed project does not include any residents, whereas Alternative C includes a residential care facility for the elderly. As a result, Alternative C could result in more demands for fire protection services provided by the Petaluma Fire Department compared to the proposed project. Significant impacts to fire protection would be greater under Alternative C compared to the proposed project, but can still be mitigated to less-than-significant levels. However, roadway usage impacts (i.e., potential degradation of roadways from trucks) for Alternative C would be less than those associated with the proposed project due to a reduction in

commercial/retail area and associated truck trips. Roadway usage impacts associated with the proposed project and Alternative C would be potentially significant; however, these impacts can be reduced to a less-than-significant level.

Cultural Resources

Under Alternative C, cultural resource impacts would be similar to the proposed project because the amount of grading would be similar between the proposed project and Alternative C. Therefore, implementation of Alternative C would result in similar impacts to unearthed cultural resources when compared to the proposed project. These impacts can be mitigated to less-than-significant levels via the mitigation measures listed in Table II-1 and included in the Initial Study (Appendix A).

Relationship of the Alternative to the Project Objectives

Alternative C would meet most project objectives. As with Alternative B discussed above, the project would still provide the same square footage for the primary home-improvement retail anchor tenant, and thus address the City's retail leakage in this sector, although at a lesser level. It would still provide local employment opportunities and net fiscal revenues to the City's General Fund. The leakage, employment opportunities, and net fiscal General Fund revenue would be reduced proportionally to the removal of square footage in retail and related commercial categories.

D. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an "environmentally superior" alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the City and/or project applicant.

In this case, only Alternative A (No Project Alternative) would result in eliminating any significant effects of the proposed project, and would create the least amount of significant environmental impacts (see Table VI-1). However, Section 15126.6 of the CEQA Guidelines requires that another environmentally superior alternative be selected in addition to the No Project Alternative. Based on the analysis provided above and in the Alternatives Comparison Table (see Table VI-1), it has been determined that Alternative C (Commercial and Residential Care Project Alternative) would be the environmentally superior alternative. Although Alternative C would not eliminate any significant impacts of the project, some of the effects of the project's significant impacts would be lessened.

**Table VI-1
Alternatives Comparison**

| IMPACT AREA | SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT | ALTERNATIVE A (No Project Alternative) | ALTERNATIVE B (Reduced Project Alternative) | ALTERNATIVE C (Commercial and Residential Care Project Alternative) |
|-------------------------------------------------|----------------------------------------------------|-----------------------------------------------|----------------------------------------------------|----------------------------------------------------------------------------|
| Geology/Soils | | | | |
| Strong Seismic Ground Shaking | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Geologic and Soil Instability | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Soil Erosion/ Loss of Topsoil | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Exposure to Geologic Hazards | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Air Quality and Greenhouse Gas Emissions | | | | |
| Grading/Construction | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |
| Operation Period GHG Emissions | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |
| Hydrology/Water Quality | | | | |
| Storm Water Quality | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Biological Resources | | | | |
| Special-Status Wildlife Species | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Jurisdictional Waters | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Noise | | | | |
| Temporary Increases in Noise Levels | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Cumulative Noise Levels | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |

| IMPACT AREA | SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT | ALTERNATIVE A (No Project Alternative) | ALTERNATIVE B (Reduced Project Alternative) | ALTERNATIVE C (Commercial and Residential Care Project Alternative) |
|---------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|----------------------------------------|---------------------------------------------|---------------------------------------------------------------------|
| Transportation/Traffic | | | | |
| Existing Plus Project Intersection-Operation Impacts <i>(East Washington Street/North McDowell Boulevard)</i> | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |
| Existing Plus Project Vehicle Queuing Impacts <i>(East Washington Street/North McDowell Boulevard, Southbound Right-turn Lane)</i> | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |
| Existing Plus Pipeline Plus Project Intersection Operation Impacts | | | | |
| <i>Corona Road/North McDowell Boulevard</i> | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |
| <i>Corona Road/Petaluma Boulevard North</i> | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |
| <i>East Washington Street/North McDowell Boulevard</i> | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |
| Existing Plus Pipeline Plus Project Vehicle Queuing Impacts | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |
| Existing Plus Pipeline Freeway Operation Impacts | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |

| IMPACT AREA | SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT | ALTERNATIVE A (No Project Alternative) | ALTERNATIVE B (Reduced Project Alternative) | ALTERNATIVE C (Commercial and Residential Care Project Alternative) |
|-------------------------------------------------------------------------------|----------------------------------------------------|-----------------------------------------------|----------------------------------------------------|----------------------------------------------------------------------------|
| Design Features (Vehicular Site Access, Internal Circulation Impacts) | | | | |
| <i>North McDowell Boulevard Right-turn Access Driveways</i> | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| <i>Rainer Avenue Extension</i> | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| <i>Lynch Creek Way</i> | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| <i>Professional Drive – Project Driveway</i> | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Non-Motorized Transportation Modes Impacts <i>(Pedestrian and Bicycle)</i> | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Emergency Access Impacts | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Cumulative Plus Project Intersection Operation Impacts | | | | |
| <i>Rainer Avenue/Maria Drive</i> | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| <i>Rainer Avenue/North McDowell Boulevard</i> | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |
| <i>Rainer Avenue/Project Access</i> | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |
| <i>Corona Road/North McDowell Boulevard</i> | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |

| IMPACT AREA | SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT | ALTERNATIVE A (No Project Alternative) | ALTERNATIVE B (Reduced Project Alternative) | ALTERNATIVE C (Commercial and Residential Care Project Alternative) |
|----------------------------------------------------------------------------------------------------------------|----------------------------------------------------|-----------------------------------------------|----------------------------------------------------|----------------------------------------------------------------------------|
| Cumulative East Washington Street/North McDowell Boulevard, Southbound Right-turn Lane Vehicle Queuing Impacts | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |
| Cumulative Freeway Operation Impacts | Significant & Unavoidable | No Impact | Significant & Unavoidable | Significant & Unavoidable |
| Site Access - Various | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Public Services (Fire Protection and Other Public Facilities) | | | | |
| Fire Protection | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Other Public Facilities (Roadway Usage) | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |
| Cultural Resources | | | | |
| Archaeological Resources | Less Than Significant With Mitigation | No Impact | Less Than Significant With Mitigation | Less Than Significant With Mitigation |

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