

6. ALTERNATIVES ANALYSIS

6.1 INTRODUCTION

The Alternatives Analysis chapter of the EIR includes consideration and discussion of a range of reasonable alternatives to the proposed project, as required pursuant to CEQA Guidelines Section 15126.6. Generally, the chapter includes discussions of the following: the purpose of an alternatives analysis; alternatives considered but dismissed; a reasonable range of project alternatives and their associated impacts in comparison to the proposed project's impacts; and the environmentally superior alternative.

6.2 PURPOSE OF ALTERNATIVES

The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126.6(a) of the CEQA Guidelines, is 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.” In the context of CEQA Guidelines Section 21061.1, “feasible” is defined as:

...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Section 15126.6(f) of CEQA Guidelines states, “The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” Section 15126.6(f) of CEQA Guidelines further states:

The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

In addition, an EIR is not required to analyze alternatives when the effects of the alternative “cannot be reasonably ascertained and whose implementation is remote and speculative.”

The CEQA Guidelines provide the following guidance for discussing alternatives to a proposed project:

- 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 comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]).
- Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code 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 (CEQA Guidelines Section 15126.6[b]).

- 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 [...] 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 (CEQA Guidelines Section 15126.6[c]).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison (CEQA Guidelines Section 15126.6[d]).
- 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 shall be discussed, but in less detail than the significant effects of the project as proposed (CEQA Guidelines Section 15126.6[d]).
- The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (CEQA Guidelines Section 15126.6[e][1]).
- If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]).

Project Objectives

Based on the above, reasonable alternatives to the project must be capable of feasibly attaining most of the basic objectives of the project. The proposed project is being pursued with the following objectives:

1. Promote and maximize new and diverse for-sale housing opportunities within the City limits and urban growth boundary through using an existing residentially zoned property;
2. Develop a high-quality residential project within the eastern City limits that is compatible with existing residential subdivisions to the east and south of the project site, Casa Grande High School to the west of the site, and the Petaluma Ecumenical Properties Senior Housing to the north of the site;
3. Develop for-sale inclusionary housing that provides site location and model types in an equitable manner;
4. Construct a public multi-use pathway through the project site and along the westerly side of Adobe Creek that connects to the Casa Grande Subdivision public pathway to the south and allows for future extension to the north of the site;
5. Install a bridge connection over Adobe Creek that connects the proposed public multi-use pathway with the residential neighborhoods to the east of the project site, allowing for pedestrian access from the easterly residential neighborhoods to Casa Grande High School and the Casa Grande Road transit locations to the west of the project site;



6. Provide public access and maintenance access to a landlocked and isolated site; and
7. Preserve Adobe Creek in its natural state.

Impacts Identified in the EIR

In addition to attaining the majority of project objectives, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed project. The significance level of impacts identified in the EIR are presented below.

Less Than Significant or No Impact

As discussed in each respective section of this EIR, the proposed project would result in a less-than-significant impact related to the following topics associated with the resource area indicated, and mitigation would not be required:

- **Biological Resources.** The EIR determined that impacts related to interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impediment of the use of native wildlife nursery sites, would be less than significant. All cumulative impacts were determined to be less than significant.
- **Hydrology and Water Quality.** The EIR determined that a less-than-significant impact would occur related to substantially altering the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: substantially increase the rate or amount of surface runoff in a manner which would result in substantial erosion or siltation on or off site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity or existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows. The EIR also determined that all cumulative impacts would be less than significant.
- **Transportation.** The EIR determined that a less-than-significant impact would occur related to a conflict with a program, plan, ordinance or policy addressing transit, bicycle, and pedestrian facilities during operations, as well as the project substantially increasing hazards to vehicle safety due to inadequate emergency access, hazardous design features, and incompatible uses. In addition, the EIR determined that a less-than-significant impact would occur related to a substantial increase to vehicle safety due to a geometric design feature or incompatible uses resulting in inadequate emergency access.

In addition, the Initial Study prepared for the proposed project during the scoping period (see Appendix A of this EIR) includes a detailed environmental checklist addressing a range of technical environmental issues. For each technical environmental issue, the Initial Study identifies the level of impact for the proposed project. The Initial Study identifies the environmental effects as either “no impact,” “less than significant,” “less than significant with mitigation incorporated,” or “potentially significant.” Impacts identified for the proposed project in the Initial Study as “no impact” or “less than significant” are listed below, and summarized further in Chapter 4.0, Introduction to the Analysis, of this EIR.



- Aesthetics (All questions);
- Agriculture and Forestry Resources (All questions);
- Air Quality (All questions);
- Biological Resources (Question f);
- Cultural Resources (Questions a and c);
- Energy (All questions);
- Geology and Soils (Questions ai through aiv, b and c, and e and f);
- Hazards and Hazardous Materials (Questions a and c through g);
- Hydrology and Water Quality (Questions b and e)
- Land Use and Planning (All questions);
- Mineral Resources (All questions);
- Noise (Questions b and c);
- Population and Housing (All questions);
- Public Services (All questions);
- Recreation (All questions);
- Utilities and Service Systems (All questions); and
- Wildfire (All questions).

As stated above, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding identified significant environmental impacts of the proposed project. Because the proposed project would not result in significant impacts related to the resource areas listed above, a detailed comparison of potential impacts associated with the aforementioned environmental issue areas as a result of project alternatives and the proposed project is not provided in this chapter. Rather, this chapter focuses on those resource areas and specific impacts listed below that have been identified for the proposed project in this EIR as requiring mitigation to reduce significant impacts to less than significant or that have been found to remain significant and unavoidable.

Less Than Significant with Mitigation

Environmental impacts (including cumulative impacts) of the proposed project that have been identified in the EIR and the Initial Study as requiring mitigation measures to ensure that the level of significance is ultimately less than significant include the following:

- **Biological Resources.** The EIR determined that impacts related to having a substantial adverse effect, either directly or through habitat modifications, on a plant species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) would result in a substantial impact. However, the EIR requires mitigation in order to ensure that the aforementioned impact is reduced to a less-than-significant level. The EIR determined that the proposed project would have a substantial adverse effect, either directly or through habitat modifications, on special-status wildlife species and special-status plants, specifically, western bumble bee, anadromous fish, foothill yellow-legged frog, California red-legged frog, northwestern pond turtle, pallid bat, Swainson's hawk, and other nesting birds and raptors. However, the EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to a less-than-significant level. Additionally, the EIR determined that the proposed project, specifically the proposed bridge connection over the Creek, would have a substantial impact on riparian habitats. However, the EIR requires mitigation in order to ensure that the



aforementioned impact is reduced to a less-than-significant level. The EIR determined that without compliance with the Clean Water Act (CWA) and California Fish and Game Code, the proposed project would have a substantial impact on State or federally protected wetlands, but with implementation of the mitigation measures required in the EIR the aforementioned impact would be reduced to less than significant. Lastly, the EIR determined that the proposed project could conflict with a local policy or ordinance protecting biological resources, such as a tree preservation policy or ordinance. However, the mitigation measures provided in the EIR would ensure that the aforementioned impact would be reduced to a less-than-significant level.

- **Hydrology and Water Quality.** The EIR determined that implementation of the project could have a significant impact due to violating a water quality standard or waste discharge requirements or otherwise substantially degrading surface or ground water quality during construction and operations. However, the EIR requires mitigation to ensure that the aforementioned impacts are reduced to a less-than-significant level.
- **Transportation.** The EIR determined that implementation of the proposed project could result in a significant impact related to conflicting with a program, plan, ordinance, or policy, except LOS, addressing the circulation system during construction activities. However, the EIR requires mitigation in order to ensure that the aforementioned impact is reduced to a less-than-significant level.

As discussed above, the Initial Study prepared for the proposed project during the scoping period (see Appendix A of this EIR) includes a detailed environmental checklist addressing a range of technical environmental issues. Impacts identified for the proposed project in the Initial Study as “less than significant with mitigation incorporated” are listed below, and summarized further in Chapter 4.0, Introduction to the Analysis, of this EIR.

- Cultural Resources (Question b);
- Geology and Soils (Question d);
- Hazards and Hazardous Materials (Question b);
- Noise (Question a); and
- Tribal Cultural Resources (All questions).

Significant and Unavoidable

The EIR has determined that the following project impacts would remain significant and unavoidable, even after implementation of the feasible mitigation measures set forth in this EIR:

- **Greenhouse Gas (GHG) Emissions.** The EIR determined that the project could generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The EIR determined that implementation of Mitigation Measure 4.2-1 would ensure project consistency with the Bay Area Air Quality Management District’s (BAAQMD’s) Transportation criterion d. However, as discussed below, because feasible mitigation measures do not exist to reduce project-related per capita Vehicle Miles Traveled (VMT) to a less-than-significant level, the proposed project would not comply with the BAAQMD’s Transportation criterion c. Consequently, the project’s incremental contribution to the cumulative significant effects of greenhouse gas



emissions and global climate change was determined to remain cumulatively considerable and significant and unavoidable.

- **Transportation.** The EIR determined that per-capita VMT associated with the proposed project would not achieve the applicable VMT reduction goal. Thus, the proposed project could conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), and the impact was determined to remain significant and unavoidable. The EIR determined that the cumulative VMT impact would be cumulatively considerable and significant and unavoidable.

The alternatives discussed herein have been chosen based on feasibility to meet most of the project objectives, as well as the ability to reduce one or more significant project impacts identified within this EIR. Thus, as is appropriate pursuant to CEQA, the following evaluation of alternatives focuses on those resource topics regarding which the proposed project would have a significant impact, according to the EIR analysis. As shown above, the EIR (including Initial Study) identified significant project impacts for nine CEQA topical categories. These nine categories are the subject of the comparative alternatives analysis that follows, unless otherwise noted. All other project impacts were deemed less than significant, and thus, do not require discussion in the alternatives analysis below.

6.3 SELECTION OF ALTERNATIVES

The requirement that an EIR evaluate alternatives to the proposed project or alternatives to the location of the proposed project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained, while reducing the magnitude of, or avoiding, one or more of the significant environmental impacts of the proposed project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the CEQA Guidelines require the EIR to “set forth only those alternatives necessary to permit a reasoned choice.” As stated in Section 15126.6(a), 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 decision making and public participation. The CEQA Guidelines provide a definition for “a range of reasonable alternatives” and thus limit the number and type of alternatives that may need to be evaluated in a given EIR. According to the CEQA Guidelines Section 15126.6(f):

The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

First and foremost, alternatives in an EIR must be feasible. In the context of CEQA Guidelines Section 21061.1, “feasible” is defined as:

...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Finally, an EIR is not required to analyze alternatives when the effects of the alternative “cannot be reasonably ascertained and whose implementation is remote and speculative.”



Alternatives Considered But Dismissed From Further Analysis

Consistent with CEQA, primary consideration was given to alternatives that could reduce one or more significant project impacts, while still meeting most of the basic project objectives.

As stated in Guidelines Section 15126.6(c), 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.

Regarding item (ii), infeasibility, 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). None of these factors establish a fixed limit on the scope of reasonable alternatives.

The following alternatives were considered but dismissed from detailed analysis in this EIR. The reason(s) for dismissal, within the context of the three above-outlined permissible reasons, are provided below.

Off-Site Alternative

In *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, the California Supreme Court indicated that a particular situation should be examined to determine whether the availability of other feasible sites must be considered in an EIR because "what is reasonable in one case may be unreasonable in another." Moreover, the court held that:

"[R]econsideration of local and regional land use policies in the context of development application is the antithesis of the comprehensive, long-range planning mandated by state law; preparation of an EIR for a proposed development should ordinarily not provide occasion for reexamination of those policies."

Such reasoning was further held by the California Supreme Court in *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, as the court determined that an EIR for a residential development consistent with planning policies of an adopted redevelopment plan did not need to examine alternative sites for the project. Relying on *Citizens of Goleta Valley v. Board of Supervisors* (1988) 197 Cal.App.3d 1167, the court held that a development proposal that implements existing planning policies should not prompt reconsideration of those policies.¹

The City of Petaluma General Plan designates the project site as Medium Density Residential, and the site is zoned Residential 4 (R4). Pursuant to the City's General Plan, the Medium Density Residential designation provides for a variety of dwelling types, including single-family and multifamily housing, and allows for a density ranging from 8.1 to 18.0 dwelling units per acre (du/ac). Single-family and multifamily residences are both permitted uses within the R4 zone. As such, the proposed project is consistent with the City's existing land use and zoning designations

¹ Stephen L. Kostka and Michael H. Zischke. *Practice Under the California Environmental Quality Act, Second Edition (Continuing Education of the Bar: California)*, Section 15.25. March 2022.



of the project site, and a review of alternative sites for the proposed project is not necessary. Therefore, the Off-Site Alternative is dismissed from detailed evaluation.

Reduced Density Alternative

Pursuant to the City's General Plan, the Medium Density Residential designation allows for a density ranging from 8.1 to 18.0 du/ac. The Reduced Density Alternative would consist of buildout of the project site with a density of 8.1 du/ac, which would result in the development of 42 dwelling units on-site. Given that the proposed project is anticipated to include the development of 59 dwelling units, the Reduced Density Alternative would result in a reduction in 17 dwelling units as compared to the proposed project.

The CEQA Guidelines state that the primary intent of an alternative is to reduce one or more of the significant environmental impacts of the proposed project. The Reduced Density Alternative would result in an equal disturbance area as the proposed project, and, therefore, the severity of impacts associated with biological resources, cultural and tribal cultural resources, geology and soils, hydrology and water quality, and construction noise are not expected to substantially differ from the proposed project. In addition, because the Alternative would result in the development of the same land uses as the proposed project, albeit at a lower density, impacts related to hazards and hazardous materials are anticipated to be similar. Transportation impacts associated with VMT, as well as impacts associated with mobile-sourced GHG emissions, would remain significant and unavoidable under the Reduced Density Alternative, as per capita VMT is not anticipated to be reduced through a reduction in density, but rather, would be increased.²

Additionally, according to the City of Petaluma General Plan Housing Element, the current Regional Housing Needs Allocation (RHNA) has identified the need for an additional 1,910 housing units within the City. While the Reduced Density Alternative would provide housing units within the City, development would occur at a lower density than the proposed project, which would hinder the City's ability to achieve the housing goals identified in the City's General Plan Housing Element.

Based on the above, the Alternative would not be considered an alternative capable of reducing one or more of the significant environmental impacts of the proposed project. As a result, the Reduced Density Alternative is dismissed from detailed evaluation.

Alternatives Considered in this EIR

Three alternatives to the proposed project were developed based on City staff input and the technical analysis performed for the proposed project. The following three alternatives are considered potentially feasible alternatives to the project and are evaluated in further detail in this section:

- No Project (No Build) Alternative;
- No Bridge Alternative; and
- Affordable Housing Alternative.

² As discussed in the CAPCOA Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (CAPCOA 2021), which presents the latest state guidance for quantifying VMT reductions, increasing residential density has been shown to affect the distance people travel and provide greater options for the mode of travel they choose.



Each of the project alternatives is described in detail below, with a corresponding analysis of each Alternative's impacts in comparison to the proposed project. As discussed above, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed project. Therefore, this chapter focuses on the resource areas and specific impacts listed above that have been identified in this EIR and Initial Study for the proposed project as requiring mitigation to reduce significant impacts to less than significant, or have been found to remain significant and unavoidable. While an effort has been made to include quantitative data for certain analytical topics, where possible, qualitative comparisons of the various alternatives to the project are primarily provided. Such an approach to the analysis is appropriate as evidenced by CEQA Guidelines Section 15126.6[d], which states that the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

The analysis evaluates impacts that would occur with the alternatives relative to the significant impacts identified for the proposed project. When comparing the potential impacts resulting from implementation of the foregoing alternatives, the following terminology is used:

- “Fewer” = Less than Proposed Project;
- “Similar” = Similar to Proposed Project;
- “Greater” = Greater than Proposed Project; and
- “None” = No Impact.

When the term “fewer” is used, the reader should not necessarily equate this to elimination of significant impacts identified for the proposed project. For example, in many cases, an alternative would reduce the relative intensity of a significant impact identified for the proposed project, but the impact would still be expected to remain significant under the alternative, thereby requiring mitigation. In other cases, the use of the term “fewer” may mean the actual elimination of an impact identified for the proposed project altogether. Similarly, use of the term “greater” does not necessarily imply that an alternative would require additional mitigation beyond what has been required for the proposed project. To the extent possible, this analysis will distinguish between the two implications of the comparative words “fewer” and “greater”.

Please see Table 6-1 at the end of the chapter for a comparison of the environmental impacts resulting from the considered alternatives and the proposed project.

No Project (No Build) Alternative

CEQA requires the evaluation of the comparative impacts of the “No Project” alternative (CEQA Guidelines Section 15126.6[e]). Analysis of the no project alternative shall:

“... discuss [...] existing conditions [...] as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” (*Id.*, subd. [e][2]) “If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the ‘no project’ alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in the property’s existing state versus environmental effects that would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed. In certain instances, the no project alternative means ‘no build,’ wherein the existing environmental setting is maintained.



However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment." (*Id.*, subd. [e][3][B]).

A No Project (No Build) Alternative assumes that the project site would remain in its current condition and would not be developed. As described in this EIR, the 280 Casa Grande Road (Assessor's Parcel Number [APN] 017-040-016) parcel contains an existing residence and undeveloped land covered in grasses. The 270 Casa Grande Road (APN 017-040-051) parcel contains an existing residence, several associated outbuildings, a landscaped backyard, and a small orchard in the northeast corner of the project site, within a depressed area, near Adobe Creek (Creek), which forms the eastern boundary of the project site. The remaining portions of the 270 Casa Grande Road parcel are generally characterized by grasses that are routinely mowed or grazed to reduce fire hazards. Grazing of both parcels is conducted by several sheep owned and cared for by the current 270 Casa Grande Road property owner. Because development of the site would not occur, land disturbance, and any associated physical environmental impacts related to such land disturbance, would not occur, and the No Project (No Build) Alternative would have no impact, as described below. However, the No Project (No Build) Alternative would not meet any of the project objectives.

Biological Resources

Under the No Project (No Build) Alternative, construction activities, including ground disturbance, would not occur on the project site. As such, the Alternative would not have the potential to impact special-status plants or special-status species such as western bumble bee, steelhead, foothill yellow-legged frog, California red-legged frog, northwestern pond turtle, pallid bat, Swainson's hawk, and other nesting birds and raptors. In addition, the No Project (No Build) Alternative would not result in a substantial adverse effect on riparian habitat and/or other sensitive natural communities or have a substantial adverse effect on federal or State protected aquatic resources. The Alternative would not include removal of trees and, thus, would not conflict with local policies and/or ordinances that protect biological resources, such as a tree preservation policy or ordinance. As such, none of the mitigation measures related to biological resources required for the proposed project would be required under the Alternative. Overall, the impacts identified for the proposed project related to Biological Resources would not occur under the No Project (No Build) Alternative.

Greenhouse Gas Emissions

The No Project (No Build) Alternative would not generate GHG emissions and, thus, the significant GHG emissions impact identified for the proposed project would not occur. Therefore, impacts related to GHG emissions would not occur under the No Project (No Build) Alternative.

Hydrology and Water Quality

The No Project (No Build) Alternative would not include any ground disturbance or otherwise alter existing site conditions and, thus, would not have the potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or ground water quality during construction and/or operation. Overall, impacts related to Hydrology and Water Quality would not occur under the No Project (No Build) Alternative.



Transportation

Because the No Project (No Build) Alternative would not introduce new homes and associated vehicle trips within the project site, the Alternative would not result in an increase in VMT within the project area, and would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). In addition, the Alternative would not conflict with a program, plan, ordinance, or policy addressing the circulation system during construction activities. Overall, impacts identified for the proposed project related to transportation would not occur under the No Project (No Built) Alternative.

Other Environmental Issue Areas

The other CEQA topics in which the proposed project could have significant impacts, as identified in the Initial Study (cultural resources, geology, hazards, noise, and tribal cultural resources), would not be impacted as a result of this alternative, and are not discussed further.

No Bridge Alternative

The No Bridge Alternative would include demolition of the on-site residence at 280 Casa Grande Road, retention of the existing residence at 270 Casa Grande Road, development of 59 dwelling units, construction of various on-site road and utility improvements, landscaping, and a new off-site public multi-use pathway along the west side of the Creek. However, the bridge connection over the Creek for the public multi-use pathway would not be developed under the No Bridge Alternative.

Given that the majority of on- and off-site improvements required under the No Bridge Alternative would still be developed, the Alternative would still require a Vesting Tentative Parcel Map, Site Plan and Architectural Review, and a Tree Removal Permit. In addition, because the No Bridge Alternative would generally result in similar development of the proposed project, Objectives #1 through #3, #6, and #7 would be fully met. However, because the bridge connection would not be developed Objective #4 would only be partially met, and Objective #5 would not be met.

Biological Resources

Buildout of the No Bridge Alternative would avoid disturbance of the Creek, as well as potential habitats for wildlife species, including steelhead, foothill yellow-legged frog, California red-legged frog, and northwestern pond turtle, to the maximum extent feasible, by limiting disturbance within the Creeks channel. Because impacts to the Creek would be avoided, Mitigation Measures 4.1-3(a), 4.1-3(b), 4.1-3(c), 4.1-4(a) through 4.1-4(g), 4.1-7(a), 4.1-7(b), 4.1-8(a), 4.1-8(b), and 4.1-8(c) would not be required under the No Bridge Alternative.

Additionally, given that the bridge connection over the Creek for the public multi-use pathway would not be developed under the No Bridge Alternative, the Alternative would not require the removal of 24 trees that are designated as protected by Petaluma Implementing Zoning Ordinance (IZO) Section 17.040, or the pruning of three additional protected trees located in proximity to the off-site bridge. The outfall structures would still be needed with buildout of the No Bridge Alternative, and as a result, two protected trees located in proximity to the outfall structures would require pruning. However, because the 24 trees proposed for removal under the proposed project would not be removed under the No Bridge Alternative, Mitigation Measure 4.1-10 would not be required, and the No Bridge Alternative would avoid impacts related to conflicts with a local policy or ordinance protecting biological resources, such as a tree preservation policy or ordinance.



Based on the above, buildout of the No Bridge Alternative would result in fewer impacts related to biological resources as compared to the proposed project.

Greenhouse Gas Emissions

Given that the No Bridge Alternative would include a similar overall area of disturbance compared to the proposed project, the Alternative would result in similar impacts related to construction generated GHG emissions.

However, given that development of the No Bridge Alternative would involve development of the same land uses as compared to the proposed project, implementation of Mitigation Measure 4.2-1 would still be required to ensure project consistency with BAAQMD's Transportation criterion d. However, as discussed in Chapter 4.4, improving the pedestrian connectivity has been shown to reduce the amount of VMT generated per person. Based on the methodology included in the California Air Pollution Control Officer's Association (CAPCOA) Handbook, the reduction to the project's per capita VMT that would be attributable to the proposed Creek bridge is approximately 0.6 percent. As such, removal of the bridge as part of project design would increase VMT associated with the proposed project, which, in turn, would result in a negligible increase in operational GHG emissions. Therefore, given the increase in VMT, the Alternative would still not comply with BAAQMD Transportation criterion a.

Overall, impacts related to Greenhouse Gas Emissions would be slightly greater under the No Bridge Alternative as compared to the proposed project, and the significant and unavoidable impact identified for the proposed project would remain.

Hydrology and Water Quality

The No Bridge Alternative would generally result in similar development as compared to the proposed project. The total disturbance area associated with the No Bridge Alternative would be slightly reduced as compared to the proposed project, and the approximately 90 cubic yards (CY) of net fill necessary under the proposed project for the abutment fill slopes would not be required. Thus, the No Bridge Alternative would slightly reduce the potential to violate water quality standards or waste discharge requirements or otherwise degrade surface or groundwater quality during construction as compared to the proposed project. Nonetheless, because the Alternative would still require preparation of a SWPPP, grading plan, and a final Stormwater Control Plan, Mitigation Measures 4.3-1(a), 4.3-1(b), and 4.3-2 would still be required. Overall, impacts related to violating any water quality standards or waste discharge requirements or otherwise degrading surface or groundwater quality during construction and operations would be fewer under the No Bridge Alternative as compared to the proposed project.

It should also be noted that as discussed in the Hydraulic Assessment prepared for the proposed project by WEST Consultants, Inc. (see Appendix E of this EIR),³ the 100-year flood depth differences associated with the proposed project and the No Bridge Alternative are generally similar. However, while the proposed project would result in Creek water surface elevation changes of approximately +0.3 feet and -0.3 feet upstream and downstream, respectively, of the bridge connection, under the No Bridge Alternative the Creek would experience water surface elevation changes of approximately +/-0.1 feet. Thus, both development scenarios, with and without the bridge, would result in minimal water surface elevation changes.

³ WEST Consultants, Inc. *Creekwood Condominium Project Hydraulic Assessment*. September 2023.



Transportation

The No Bridge Alternative would generally result in similar development as compared to the proposed project. As such, construction traffic could still interfere with existing roadway operations during the construction phase, and Mitigation Measure 4.4-1 would still be required. With regard to VMT-related impacts, as discussed in Chapter 4.4, improving the pedestrian connectivity has been shown to reduce the amount of VMT generated per person. Based on the methodology included in the CAPCOA Handbook, the reduction to the project's per capita VMT that would be attributable to the proposed Creek bridge is approximately 0.6 percent. As such, removal of the bridge as part of project design would insubstantially increase VMT associated with the proposed project, and the significant and unavoidable impact would remain. Therefore, the No Bridge Alternative would result in slightly greater impacts to transportation as compared to the proposed project.

Other Environmental Issue Areas

Development of the No Bridge Alternative would involve a smaller disturbance footprint, as the bridge abutments on the Creek banks would not be included. However, given that the No Bridge Alternative would still result in the development of the same land uses as compared to the proposed project, impacts associated with the other CEQA topics in which the proposed project could have significant impacts, as identified in the Initial Study (cultural resources, geology, hazards, noise, and tribal cultural resources), would be anticipated to be similar in scale under the No Bridge Alternative, and are therefore not discussed further.

Affordable Housing Alternative

Under the Affordable Housing Alternative, the 59 residential units proposed to be developed on-site would be offered as affordable housing. All other on- and off-site improvements proposed as part of the project, including demolition of the on-site residence at 280 Casa Grande Road, retention of the existing residence at 270 Casa Grande Road, construction of various on-site road and utility improvements, landscaping, and a new off-site public multi-use pathway, with a bridge connection over the Creek, would remain the same.

Given that all on- and off-site improvements required under the Affordable Housing Alternative would be the same as the proposed project, the Alternative would still require a Vesting Tentative Parcel Map, Site Plan and Architectural Review, and a Tree Removal Permit. In addition, because the Affordable Housing Alternative would generally result in similar development of the proposed project, all project objectives would be met.

Biological Resources

Given that all on- and off-site improvements required under the Affordable Housing Alternative would be the same as the proposed project, the Affordable Housing Alternative would result in similar impacts related to biological resources as compared to the proposed project, and Mitigation Measures 4.3-2 through 4.3-10 would still be required.

Greenhouse Gas Emissions

Given that all on- and off-site improvements required under the Affordable Housing Alternative would be the same as the proposed project, implementation of Mitigation Measure 4.2-1, which would require three EV capable parking spaces be installed prior to the approval of project improvement plans, would still be required to ensure project consistency with BAAQMD's Transportation criterion d. However, according to the Governor's Office of Planning and Research (OPR), adding affordable housing to an area generally improves the jobs-housing match, in turn



shortening commutes and reducing VMT because low-wage workers in particular are more likely to choose a residential location close to their workplace if one is available. Additionally, even in areas where the existing jobs-housing match is closer to optimal, affordable housing is still shown to generate less VMT than market-rate housing. Because under the Affordable Housing Alternative, the 59 residential units proposed to be developed on-site would be offered as affordable housing, the screening guidance provided by OPR would apply, and therefore, the Alternative would have a less-than-significant impact on VMT.³¹ Accordingly, given that VMT associated with the Alternative would be less than significant, the Alternative would comply with BAAQMD Transportation criterion a.

Overall, because the Affordable Housing Alternative would involve reduced VMT, the Alternative would result in fewer impacts related to GHG emissions as compared to the proposed project, and the significant and unavoidable impact that would occur under the proposed project would be eliminated.

Hydrology and Water Quality

Given that all on- and off-site improvements required under the Affordable Housing Alternative would be the same as the proposed project, the Affordable Housing Alternative would result in similar impacts related to hydrology and water quality as compared to the proposed project, and Mitigation Measures 4.3-1(a) through 4.3-2 would still be required.

Transportation

Similar to the proposed project, the Affordable Housing Alternative would add construction vehicle traffic to area roadways, thereby potentially conflicting with existing traffic patterns. As such, Mitigation Measure 4.4-1 would still be required. With regard to impacts related to VMT, and as stated above, according to OPR, adding affordable housing to an area generally improves the jobs-housing match, in turn shortening commutes and reducing VMT because low-wage workers in particular are more likely to choose a residential location close to their workplace if one is available. Additionally, even in areas where the existing jobs-housing match is closer to optimal, affordable housing is still shown to generate less VMT than market-rate housing. Because under the Affordable Housing Alternative, the 59 residential units proposed to be developed on-site would be offered as affordable housing, the screening guidance by OPR would apply, and, therefore, the Alternative would have a less-than-significant impact on VMT.

Overall, because the Affordable Housing Alternative would result in a reduction in VMT, the Alternative would result in fewer impacts related to transportation as compared to the proposed project, and the significant and unavoidable impact would be eliminated.

Other Environmental Issue Areas

Given that development of the Affordable Housing Alternative would involve the same disturbance footprint and development of similar land uses as compared to the proposed project, impacts associated with the other CEQA topics in which the proposed project could have significant impacts, as identified in the Initial Study (cultural resources, geology, hazards, noise, and tribal cultural resources), are anticipated to be similar in scale under the Affordable Housing Alternative, and are therefore not discussed further.

³¹ Governor's Office of Planning and Research. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December 2018.



6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. The environmentally superior alternative is generally 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. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” In this case, the No Project (No Build) Alternative would be considered the environmentally superior alternative, because the project site is assumed to remain in its current condition under the alternative. Consequently, impacts resulting from the proposed project would not occur under the Alternative, as shown in Table 6-1.

The No Project (No Build) Alternative would not meet any of the project objectives. The No Bridge Alternative would meet most project objectives. As previously noted, the No Bridge Alternative would fully meet Objectives #1 through #3, #6, and #7. However, because the bridge connection would not be developed Objective #4 would only be partially met, and Objective #5 would not be met. The Affordable Housing Alternative would meet all objectives.

As discussed throughout this chapter and shown in Table 6-1, the No Bridge Alternative could result in greater impacts than the proposed project related to GHG emissions and transportation; fewer impacts related to biological resources and hydrology and water quality, and similar impacts to the proposed project for cultural resources, geology and soils, hazard and hazardous materials, noise, and tribal cultural resources. The Affordable Housing Alternative would result in fewer impacts related to GHG emissions and transportation, and similar impacts to the proposed project for biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, and tribal cultural resources. Furthermore, the project’s two significant and unavoidable impacts would be eliminated with buildout of the Affordable Housing Alternative.

Based on the above, the Affordable Housing Alternative would be considered the environmentally superior alternative to the proposed project.



**Table 6-1
Comparison of Environmental Impacts for Project Alternatives**

Resource Area	Proposed Project	No Project (No Build) Alternative	No Bridge Alternative	Affordable Housing Alternative
Biological Resources	Less-Than-Significant with Mitigation	None	Fewer	Similar
Cultural Resources	Less-Than-Significant with Mitigation	None	Similar	Similar
Geology and Soil	Less-Than-Significant with Mitigation	None	Similar	Similar
Greenhouse Gas Emissions	Significant and Unavoidable	None	Greater	Fewer*
Hazards and Hazardous Material	Less-Than-Significant with Mitigation	None	Similar	Similar
Hydrology and Water Quality	Less-Than-Significant with Mitigation	None	Fewer	Similar
Noise	Less-Than-Significant with Mitigation	None	Similar	Similar
Transportation	Significant and Unavoidable	None	Greater	Fewer*
Tribal Cultural Resources	Less-Than-Significant with Mitigation	None	Similar	Similar
Total Fewer:		9	2	2
Total Similar:		0	5	7
Total Greater:		0	2	0
Note: No Impact = "None;" Less than Proposed Project = "Fewer;" Greater than the Proposed Project = "Greater;" Similar to Proposed Project = "Similar," and significant and unavoidable impact eliminated = *.				

