

## 5.0 CEQA CONSIDERATIONS

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- 5.1 Significant Unavoidable Impacts
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### 5.1 SIGNIFICANT UNAVOIDABLE IMPACTS

The State CEQA Guidelines require a description of any significant impacts, including those which can be mitigated but not reduced to a level of insignificance (section 15126.2(b)). Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described. This EIR did not identify any significant unavoidable impacts for the proposed Riverfront Mixed-Use Development Project.

### 5.2 GROWTH INDUCEMENT

CEQA requires that any growth-inducing aspect of a project be discussed in an EIR. This discussion should include consideration of ways in which the project could directly or indirectly foster economic or population growth in adjacent and/or surrounding areas. Projects which could remove obstacles to population growth (such as major public service expansion) must also be considered in this discussion. According to CEQA, it must not be assumed that growth in any area is necessarily beneficial, detrimental or of little significance to the environment.

#### Population Growth

The proposed project will accommodate phased development of a mixed use project, consisting of residential, hotel, office, commercial, park and open space uses. The proposed project will lead to the development of 273 residential units (134 single-family homes, 39 townhomes and 100 apartments), which would result in an estimated population increase of approximately 710 residents based on an average household size of 2.6 residents per dwelling unit. Thus, the project would increase population, but the estimated growth is within the growth projections anticipated by the *City's General Plan 2025*. The new residential population supported by the project is consistent with buildout estimates developed in the City's General Plan, and the project would not result in substantial growth inducement as discussed below.

The City of Petaluma had an estimated population of 57,085 in 2005 when the General Plan and EIR were prepared. As of January 1, 2013, the City had a population of 58,804 residents according to information provided by the California Department of Finance<sup>1</sup>. The City's General Plan forecasts a total population of 72,707 residents within the City in the year 2025. Population growth resulting from the proposed residential land uses would be within the level of projected residential development and population growth considered in the City's General Plan and EIR given the existing population of 58,804 residents and the forecast population of 72,707 in the year 2025.

Furthermore, the level of proposed residential development is substantially less than the amount of development envisioned for the area in the *Central Petaluma Specific Plan* (CPSP). The project site is located at the eastern end of the "Lower Reach" subarea of the CPSP that was adopted by the Petaluma City Council on June 2, 2003. The property is designated MU-"Mixed Use" in the Specific Plan, which allows for a variety of residential, commercial office, retail and industrial uses consistent with the respective development regulations established within the Specific Plan area. The CPSP EIR identified a potential for 2,716 new residential units in the "Lower Reach" subarea in which the project site is located, and the analysis in the CPSP EIR was based on a "cap" equal to 25% of the overall maximum development potential, resulting in a total of 679 residential units in the Lower Reach subarea. Other than the project site, the only other property designated for mixed uses within the Lower Reach subarea is the former City wastewater treatment plant site to the west of the project site, which is now used as a pump station. The remainder of the Lower Reach area is designated for "river dependent industrial" uses. Thus, it would be expected that the residential buildout estimated for the Lower Reach area would occur primarily on the subject project site. Therefore, the proposed project development of 273 residential units is well below the potential development of 679 residential units that was estimated and analyzed for the project area in the CPSP EIR.

The project "Fiscal and Economic Impact Analysis" (FEIA) estimated that the project would produce 348 onsite workers. Given the nature of the uses (hotel, retail, and office), it is expected that these employees would be drawn from the local area. Thus, the project would not indirectly foster population growth as a result of new jobs.

### Economic Growth

The proposed project will result in future development of a 120-room hotel, 60,000 square feet of office space, and 30,000 square feet of commercial space as part of the mixed use project proposed on the site. According to a fiscal and economic study, the proposed project is anticipated to annually generate a net fiscal benefit to the City of Petaluma of approximating \$616,000 and an annual recurring surplus to the City's General Fund approximating \$206,000 per year at full build-out (Keyser Marston Associates, March 2013). The future non-residential

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<sup>1</sup> Based on California Department of Finance "City/County Population and Housing Estimates, 1/1/2013."

uses would generate sales tax and transient occupancy taxes. These non-residential uses also would result in generation of new employment opportunities both in terms of direct construction jobs and onsite permanent jobs, as well as indirect jobs to supporting businesses. The purchase of materials, supplies and services by the businesses on the project site, as well as, the expenditures of Project employees on goods and services in Petaluma will generate additional employment through the “multiplier” effect. Thus, the project would foster economic growth in the area.

### Removal of Obstacles to Growth

The project would not result in extension of services to properties other than the project site, and such extension would not remove obstacles to growth on other adjacent properties that have not been developed in the past. The project would allow for future extension of Caulfield Lane over the Petaluma River to connect to Petaluma Boulevard South as envisioned in the City’s General Plan. There are no current plans for the extension.

## **5.3 CUMULATIVE IMPACTS**

The State CEQA Guidelines section 15120(a) requires that an EIR discuss cumulative impacts of a project “when the project’s incremental effect is cumulatively considerable.” As defined in Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. As defined in section 15065(a)(3), “cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. Cumulative projects may consider either a list of past, present and probable future projects producing cumulative impacts or a summary of projections contained in an adopted plan that evaluates conditions contributing to cumulative impacts.

An evaluation of cumulative impacts is required by CEQA when they are significant. When the combined cumulative impact associated with the project’s incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR.

An EIR may determine that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant, when for example, a project funds its fair share of a mitigation measure designed to alleviate the cumulative impact. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project’s contribution to any significant cumulative effects.

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact. If a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact as provided in section 15183(j).

The Riverfront Mixed Use project is located within the City's Urban Growth Boundary. Buildout and development in the City were evaluated in the General Plan 2025 EIR. The project will contribute to the cumulative impacts identified in the City's GP EIR. The California Environmental Quality Act (CEQA) also allows a lead agency to avoid repeating analyses that were already provided in a certified General Plan EIR (Public Resources Code section 21083.3) for projects that are consistent with the General Plan. Pursuant to section 21083.3(b), if a development project is consistent with the general plan of a local agency for which an environmental impact report was certified, the application of CEQA shall be limited to effects on the environment which are "peculiar to the parcel or to the project" and which were not addressed as significant effects in the prior environmental impact report. Section 15183 of the State CEQA Guidelines provides further guidance related to Public Resources Code section 21083 in order to streamline review of projects consistent with the General Plan for which an EIR was prepared and certified, and to reduce repetitive environmental studies.

State CEQA Guidelines section 15183(a) indicates that in accordance with CEQA mandates, projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified, shall not require additional environmental review, except as necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies. Subsection (i) further states that if a significant offsite or cumulative impact was adequately discussed in the prior EIR, then this section (15183) may be used as a basis for excluding further analysis of that offsite or cumulative impact.

The proposed project land uses are consistent with the land use designations in the *General Plan 2025*, which indicates that land uses, densities and FARs within the boundary of the *Central Petaluma Specific Plan (CPSP)* shall be undertaken in accordance with the CPSP. The proposed project is consistent with the mixed-use land designations in both the CPSP and General Plan. As part of the overall estimated buildout, both the General Plan and General Plan EIR indicate that the General Plan will result in approximately 6,005 additional housing units for a total buildout of approximately 27,950 units within Petaluma in the year 2025. The General Plan is intended to accommodate an additional 6.1 million square feet of non-residential space, resulting in a total of approximately 23 million square feet of non-residential

floor area in the City. Development pursuant to the General Plan includes the CPSP (the area in which the proposed project is located), as well as approved projects at the time the EIR was prepared.

Since 2005 (the General Plan EIR “baseline” year), approximately 1,000<sup>2</sup> residential units have been constructed within Petaluma, and an additional 214 single-family residential units and 1,068 multi-family units are currently under construction, approved or have permit applications pending before the City. Very little non-residential space has been constructed since 2005. With approximately 785,850 square feet under construction, approved or pending permit review, it is estimated that approximately 1,000,000 square feet of non-residential space will have been constructed since 2005.

The proposed project would result in development of 134 single-family residential units, 39 townhomes, 100 multi-family residential units, a 120-room hotel, and 90,000 square feet of non-residential space. With the project and other current, pending and past projects, development within the City since 2005 totals approximately 2,555 residential units and approximately 1,000,000 square feet of non-residential uses, which is well below the buildout estimate of about 6,000 additional residential units and 6.1 million square feet of non-residential uses that was evaluated in the General Plan EIR.

Because CEQA discourages “repetitive discussions of the same issues” (CEQA Guidelines section 15152(b)), and because the project is consistent with the City’s *General Plan 2025*, the City has determined the project meets the provisions of CEQA section 21083.3(b), and therefore, the City’s *General Plan 2025* EIR has adequately addressed the following issues, and no further environmental review is required pursuant to Public Resources Code section 21083.3: cumulative impacts for all topics except greenhouse gas emissions, which is further discussed below. The proposed project does not increase the severity of any of the impacts from the levels identified and analyzed in the General Plan.

Additionally, the project traffic report updates the General Plan EIR cumulative analysis and also provides supplemental review of near-term cumulative projects, and thus cumulative traffic impacts are also reviewed below. The General Plan EIR also identified significant impacts related to noise with citywide buildout. The cumulative noise impact is related to exposure to traffic and rail noise sources, but the analyses conducted for the proposed project indicate that project buildings can be designed to attenuate for exterior noise sources and meet interior sound level requirements.

The City of Petaluma *General Plan 2025* Environmental Impact Report (EIR) was certified on May 19, 2008. The City’s General Plan and EIR are also available for review at City of Petaluma Community Development Department, Planning Division, located at 11 English

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<sup>2</sup> Based on California Department of Finance “City/County Population and Housing Estimates, 1/1/2013.”

Street in Petaluma, on Monday through Thursday between the hours of Hours: 8 AM to 12 PM and 1 PM to 5 PM, and online at: <http://cityofpetaluma.net/cdd/plan-general-plan.html>.

### Greenhouse Gas Emissions

Petaluma's *General Plan 2025* EIR analyzes greenhouse gas (GHG) emissions, and compared 2005 greenhouse gas emissions (baseline for the General Plan) to 2025 emissions (buildout of the General Plan) to determine if implementation of the General Plan would make a considerable contribution to the cumulative effects of greenhouse gases. Taking into account emissions savings from programs identified in the Climate Change section of the General Plan, as well as State reduction measures that apply to the local level, the analysis found that implementation of the General Plan would decrease greenhouse gas emissions relative to 2005 levels. However, because not all the State reduction measures had been formally adopted at the time the General Plan EIR was prepared, the EIR concluded that there is a substantial level of uncertainty about their effectiveness and how they will apply to local governments. The EIR found that it cannot be determined, to a reasonable degree of certainty, that buildout under the General Plan will not result in a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change. Accordingly, the EIR concluded that the cumulative global climate change impacts related to General Plan buildout could remain significant and unavoidable.

The General Plan EIR was certified and the General Plan was adopted in early 2008 prior to completion of other plans and regulations, including the adoption of the State Scoping Plan, changes to CEQA and the State CEQA Guidelines regarding evaluation of GHG emissions, and adoption of updated CEQA Guidelines by the Bay Area Air Quality Management District (BAAQMD). As discussed in the AIR QUALITY (Chapter 4.1) section of this EIR, the BAAQMD was the first district to adopt a threshold of significance for GHG emissions. The adopted threshold for a Plan-level project, such as a General Plan, is 6.6 metric tons of carbon dioxide equivalent (MT CO<sub>2e</sub>) per service population, which includes residents and employees. The City's General Plan Final EIR identified GHG emissions in the year 2025 as 721,600 without any reductions. For the year 2025, the General Plan EIR identified a residential population of 72,707 and 44,450 employees for a total service population of 117,157. This represents approximately 6.16 MT CO<sub>2e</sub>, which is below the adopted thresholds. Based on current standards of review, buildout under the General Plan, which includes the proposed project, would not result in a significant cumulative impact related to GHG emission. The project analysis also found that project emissions would be below thresholds of significance for a specific project. The per capita rate would be lower (4.06 MT CO<sub>2e</sub>) with implementation of GHG emissions reduction strategies as identified in the General Plan EIR.

The proposed project does not increase the severity of any of the impacts from the levels identified and analyzed in the General Plan. The General Plan EIR found greenhouse gas emissions to be a significant impact, but the analyses in this EIR found that project emissions

would be below thresholds of significance, and thus, the project's GHG emissions would not result in a cumulatively considerable impact.

### Traffic

#### CUMULATIVE GROWTH WITH GENERAL PLAN BUILDOUT

The *General Plan 2025* EIR included a cumulative analysis of the Lakeville corridor. The study area intersections addressed in the Riverfront project traffic study at buildout of the City's General Plan are included in the City's General Plan EIR traffic analyses for a buildout year of 2025. The EIR found that buildout accommodated under the General Plan would result in unacceptable intersection operations of LOS F at the Lakeville Street/Caulfield Lane and Lakeville Street/D Street intersections with buildout under the General Plan. The General Plan EIR found these impacts to be significant and unavoidable, citing that the addition of new lanes and/or expanded capacity would be in conflict with the Plan's policies relating to improving multi-modal circulation, and the City adopted Findings of Overriding Consideration with the adoption of the General Plan. Because of potential queuing concerns at the Lakeville Street/Caulfield Lane intersection, future improvements to reduce vehicle queues are projected to be necessary upon extension of Caulfield Lane over the Petaluma River according to the project traffic study. The improvements would be needed without and with the proposed Riverfront project (Whitlock & Weinberger Transportation, March 2012).

The Riverfront project traffic analysis reviewed the General Plan traffic model and adjusted the buildout projections to reflect the proposed project uses as the General Plan buildout land use projections included in the General Plan EIR traffic analysis included a more intense level of development on the proposed project than is currently proposed. As a result, there was a reduction of daily and peak hour trips. The project would contribute to significant cumulative traffic impacts that would cause a deterioration of level of service to E-F at the Petaluma Boulevard/East D Street intersection and LOS F at the Lakeville Street/East D Street intersection during the evening peak period at General Plan buildout. The project traffic study also indicated that buildout of the General Plan is not expected to occur by the year 2025 due to economic conditions. Rather, future cumulative impacts were projected to occur in year 2035 at the earliest.

The City's General Plan includes an extension of Caulfield Lane through the project site and over Petaluma River as a future project. There are no current plans for the extension or known timeline that this would occur. The proposed Riverfront project would construct the portion of the extension between Hopper Street and the Petaluma River. Extension over the river to Petaluma Boulevard is included in the City's Traffic Impact Fee program. Development on the project site would be subject to payment of traffic impact fees. In the future, with development of the proposed Riverfront project and completion of the General Plan's "southern crossing" extension of Caulfield Lane through the project site and over the Petaluma River to Petaluma Boulevard South, the intersection at Hopper street/Caulfield Lane would be expected to

operate unacceptably at LOS F in its current configuration. Signalization of the intersection and the addition of a northbound left turn pocket on Caulfield Lane Extension would improve operation to LOS C. These improvements are not included as part of the proposed Riverfront project but are recommended in the project traffic report to be constructed once Caulfield Lane is extended over the Petaluma River. The project traffic report recommends that the proposed project contribute its fair share toward the cost of signalization at Hopper Street/Caulfield Lane, which is estimated in the project traffic report to be 21%. The project traffic report includes recommendations for other improvements at the Caulfield/Lakeville intersection once Caulfield Lane is extended over the Petaluma River.

As indicated above, the project is consistent with the General Plan buildout analyzed in the General Plan EIR, which fully assesses cumulative traffic impacts on City streets and intersections, and under provisions of CEQA section 21083.3, no further analysis of cumulative traffic due to General Plan buildout is required. The proposed project does not increase the severity of any of the impacts from the levels identified and analyzed in the General Plan, and results in a reduction of trips from those accounted for in the General Plan EIR. Furthermore, the project will contribute traffic impact fees that will help to improve multimodal circulation in central Petaluma, which in combination with implementation of the Mitigation Measures Cum-1 and Cum-2 will mitigate the project's contribution to cumulative traffic impacts.

U.S. Highway 101 currently operates below Caltrans' target LOS C/D threshold during the PM peak hour and is projected to do so under future cumulative conditions, including the scenario with pending projects and the future scenario with General Plan buildout. The project traffic study indicates that a significant cumulative impact is considered to occur if a project would increase the freeway v/c ratio on a facility already operating at Los E or F by 0.01 or more. In each case, the project's contribution would be less than 0.01 (0.008 or less), and the project's incremental contribution would not be considered cumulatively considerable. (See Table 4.8-7 in the TRANSPORTATION and TRAFFIC (Chapter 4.8) section of this EIR.

#### NEAR-TERM CUMULATIVE DEVELOPMENT

Even though the project is within the cumulative growth analyzed in the General Plan EIR, and further analysis is not warranted, the project traffic study also evaluated a scenario ("Baseline") with projects that were approved and/or under construction at the time the traffic study was conducted. The baseline scenario analysis included in the traffic study is generally consistent with the current list of approved projects in the City, the largest being the East Washington Place shopping center, which was included in the original traffic study. One project that has been approved in the vicinity since the original Riverfront traffic study is the 360 Church project on Lindberg Lane, although this project is anticipated to generate negligible volumes to the study intersections and roadways during the critical weekday a.m. and p.m. peak hours.



The project traffic study did not include traffic associated with the Downtown Petaluma SMART station in the near term cumulative scenario, although such traffic is accounted for in the City's traffic model as included in the General Plan EIR. The Downtown SMART station is not intended for park-and-ride users; rather it is intended to be used primarily by residents, visitor and employees in the downtown area who would walk ride or use shuttles when traveling to and from the station. While commencement of SMART rail service may slightly increase traffic activity surrounding stations with commuter parking lots, it will also reduce commuter-related automobile traffic oriented to and from U.S. Highway 101, particularly on corridors such as Lakeville Street, which is a major vehicle connector to the freeway system (Whitlock & Weinberger Transportation, November 2013).

Under the near term cumulative scenario and with the proposed project, all study area intersections are projected to operate acceptably at LOS D or better, except for the Lakeville Street/D Street intersection, which is projected to operate unacceptably at LOS E during the AM peak hour. The project traffic study recommends that the proposed project be responsible for improvements at the Lakeville Street/Caulfield Lane intersection even though the unacceptable LOS is projected to occur in the future without the proposed project. The improvements would improve capacity and safety at the intersection by lengthening the westbound left-turn pocket to approximately 250 feet in order to reduce the occurrence of spillover blockages into adjacent through lanes and the installation of a raised median on the westbound approach to physically prohibit illegal left turn movements into and out of adjacent properties, thereby improving safety.

Subsequent to the preparation of the 2012 project traffic analysis, the project traffic engineer provided updated LOS projections for the Lakeville Street/D Street intersection in the near term cumulative scenario to account for SMART rail station use as the Station Master Plan indicates that in the near-term, station parking would likely be located along D Street. The results indicate that the intersection would be expected to operate at the same LOS of E as identified in the traffic study, and the conclusions and findings remain unchanged (Whitlock & Weinberger Transportation, November 2013)

The project traffic engineer also reviewed the potential effects of rail operations on intersection operations. Mitigation measures are included in the SMART EIR to minimize rail impacts near the downtown stations, including implementation of signal timing and sequencing that integrates the train detection system with traffic signals, minimizing delays. Based on anticipated train headways and rail gate operations, it is projected that rail gates would be active approximately 2.3 minutes out of each peak hour (Whitlock & Weinberger Transportation, November 2013). While there will be delays to some drivers, such delays represent only a small portion of the total delay encountered during the entire peak hour.

The project will contribute traffic impact fees that will help to improve multimodal circulation in central Petaluma, which in combination with implementation of the following measures, will mitigate the project's contribution to cumulative traffic impacts.

CUM-1. Require payment of the project's 21% pro-rata share of the cost of signalization at Hopper Street/Caulfield Lane in the future when an extension of Caulfield Lane over the Petaluma River is completed.

CUM-2. The Applicant shall lengthen the westbound left turn pocket at Lakeville Street/Caulfield Lane to approximately 250 feet, and install a raised median on the westbound approach to physically prohibit illegal left turn movements into and out of adjacent properties, as recommended in the project traffic report, in order to improve capacity and safety at the intersection.

## 5.4 PROJECT ALTERNATIVES

According to the State CEQA Guidelines (section 15126.6), 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. The guidelines further require that the discussion focus on alternatives capable of eliminating significant adverse impacts of the project, or reducing them to a level of insignificance even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternatives analysis should also identify any significant effects that may result from a given alternative. 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. An EIR is not required to consider alternatives which are infeasible.

The lead agency is responsible for selecting a range of potentially feasible project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those potentially feasible alternatives necessary to permit a reasoned choice. 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 determines could feasibly attain most of the basic objectives of the project. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.

"Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (State CEQA Guidelines section 15364). 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 establishes a fixed limit on the scope of reasonable alternatives.

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.

## SUMMARY OF SIGNIFICANT IMPACTS & PROJECT OBJECTIVES

### Significant Project Impacts

The Draft EIR identified the following significant impacts that can be reduced to less-than-significant levels with implementation of identified mitigation measures recommended in this EIR.

- **Air Quality 4.1-1** - *Criteria Pollutant Emissions*. Generation of fugitive dust during construction.
- **Air Quality 4.1-2b** - *Expose Sensitive Receptors to Pollutants During Construction*. Sensitive onsite receptors could be exposed to substantial temporary concentrations of pollutants during construction due to diesel equipment exhaust.
- **Air Quality 4.1-3** – *Objectionable Odors*. Potential exposure of project residents and occupants to objectionable odors.
- **Biological Resources 4.2-1** - *Wetlands*. Fill of 0.24 acres of onsite wetlands, most of which are jurisdictional wetlands, but will not result in significant impacts to special status species or habitat value.
- **Biological Resources 4.2-2** - *Special Status Species*. Site preparation could result in direct impacts to nesting bird species, if they are present, including potential special status bird species.
- **Cultural Resources 4.3-1** - *Discovery of Archaeological Resource*. Potential disruption of previously undiscovered archeological resource during construction.
- **Cultural Resources 4.3-2** – *Disturb Human Remains*. The project could disturb undiscovered human remains, including those interred outside of formal cemeteries.
- **Geology and Soils 4.4-1** – *Exposure to Seismic Hazards*. Future project structures, residents and occupants at the site would be subject to strong seismic shaking and liquefaction hazards.

- **Geology and Soils 4.4-2 – *Soil Settlement*:** Future structures at the project site would be subject to soil settlement with potential damage to structures and utilities.
- **Geology and Soils 4.4-3 – *Expansive Soils*:** Future structures at the project site would be subject to expansive soils with potential damage to structures and utilities.
- **Geology and Soils 4.4-4 – *Erosion*:** Grading could result in inadvertent erosion or soil transport into the Petaluma River.
- **Hazards and Hazardous Materials 4.5-2 – *Exposure to Soil-Water Contamination*:** The potential reuse of onsite stockpiled soils or discovery of unknown hazardous materials during construction could pose a hazard to workers during construction.
- **Hydrology and Water Quality 4.6-1 – *Stormwater Drainage*:** Increased stormwater runoff that would result in potentially significant impacts if storm drains are not properly sized.
- **Hydrology and Water Quality 4.6-2 – *Water Quality & Stormwater Discharge*:** Grading activities and future runoff from the developed project site could result in non-point and point source pollution into the Petaluma River, if not properly controlled.
- **Noise 4.7-1 – *Elevated Noise Exposure*:** Potential exposure of people to noise levels that exceed the Petaluma General Plan 2025 Land Use-Noise Compatibility Standards and City regulations.
- **Noise 4.7-5 – *Temporary Increase in Noise*:** Temporary increase in ambient noise during buildout of future development phases.
- **Transportation and Traffic 4.8-4 – *Rail Crossing*:** The project will result in an increase in daily and peak hour trips, but would not substantially increase hazards due to conflicts between motorists, pedestrians, bicyclists and rail operations. However, if supplemental safety measures to be implemented as part of the SMART rail service are not in place before project completion, potential hazards could result.
- **Cumulative Traffic Impacts 5.3** – The project would contribute to significant cumulative traffic impacts.

### Project Objectives

According to the project applicant, the proposed project is intended to meet the following objectives:

1. Provide a mix of residential housing types including single-family detached, townhomes and apartments.
2. Provide a mix of land uses accommodating a stand-alone hotel and office complex, along with ground-floor commercial space within vertical mixed-use buildings.

3. Provide ownership opportunities for smaller businesses and promote the development of new businesses.
4. Help meet the housing needs created by the new jobs within the project and help alleviate the City's housing shortage and address the City's current housing needs.
5. Promote a pedestrian-oriented, mixed-use neighborhood development with a compact design to reduce vehicle usage and therefore reduce traffic, air pollution, and greenhouse gas emissions.
6. Help diversify the City's economic base by incorporating a flexibly designed project to accommodate both established and start-up businesses of different needs, sizes, and uses as well as a limited service hotel that satisfies a current City need.
7. Generate long-term tax revenue to the City by developing a hotel, office complex and ground floor commercial spaces.
8. Enhance the river corridor by developing a pedestrian and bicycle oriented linear park, consistent with the Petaluma Access and Enhancement Plan.
9. Generate local employment opportunities, both in short-term construction employment, and long-term project employment.
10. Balance the local, type and quantity of land uses to ensure a financially feasible development project.
11. Locate commercial, office and hotel spaces close to the foreseeable-term access point (Hopper Street) to ensure maximum viability and success.
12. Minimize, to the extent feasible, the amount of land dedicated to vehicular access.

## ALTERNATIVES CONSIDERED

Section 15126.6(c) of the State CEQA Guidelines indicates that the range of potential alternatives 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 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 include failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental impacts.

The following alternatives were considered and eliminated as discussed below:

- Alternate Location. The City did not consider off-site locations, as the Central Petaluma Specific Plan considered a range of land uses throughout the planning area.

- Change in Non-Residential Uses. Elimination or a significant reduction of non-residential uses was not considered as such an alternative would expressly violate the CPSP and General Plan land use designations and directives for the area to be developed as a mixed use project. As such, the commercial uses support the other uses on the site.
- Increased Density. An alternative to maximize the permitted land use intensity was rejected as it would generally result in new or more severe significant impacts.

The alternatives set forth below are assessed in the following subsection:

1. No Project as required by CEQA Guidelines
2. Modified Subdivision Layout
3. Reduction in Project Size

## PROJECT ALTERNATIVES EVALUATION

### ALTERNATIVE 1: No Project

Section 15126.6(e) of the State CEQA Guidelines requires that the impacts of a “no project” alternative be evaluated in comparison to the proposed project. The Guidelines indicate that the EIR should discuss the existing conditions at the time the notice of preparation is published, 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.

#### PROJECT CHARACTERISTICS

Under the no project alternative that is required for review under CEQA, the proposed project would not be processed and the proposed project land uses would not be constructed. The property would remain designated for mixed use development in the City’s General Plan, Central Petaluma Specific Plan and SmartCode zoning regulations. Thus, while in the near future the property could be expected to remain undeveloped, in the longer term, it is likely that another site plan would be developed for the property. It would be speculative to try to determine what that future development proposal would be, but it is likely that it would continue to be a mixed-use project given existing land use designations.

#### PROJECT IMPACTS

The “No Project” Alternative assumes that the proposed project would not be approved or proceed to development stages. The site would remain vacant, and none of the impacts identified in this EIR would occur. As indicated above, the site would remain designated for

mixed-use development, and a different project could be proposed and considered in the future with potential environmental impacts. Thus, some of the impacts identified in this EIR could result at some unknown time in the future and at an unknown magnitude if new development plans, consistent with City plans, are developed.

#### ABILITY TO MEET PROJECT OBJECTIVES

The No Project Alternative would not meet any of the stated project objectives.

### **ALTERNATIVE 2: Modified Subdivision Layout**

#### PROJECT CHARACTERISTICS

Under this alternative, the proposed tentative map would be modified to provide for greater protection of jurisdictional wetlands and to create a greater distance between the rail corridor and planned townhomes. The RWQCB asked that alternatives be reviewed to minimize fill of jurisdictional wetlands. This alternative would maintain most of the drainage channel through the site except for areas where it crosses proposed roadways; roadway width was maintained to meet City requirements and ensure emergency vehicle access. As a result, the alternative would protect nearly 70% of the onsite drainage channel (approximately 0.11 acre). It is noted that the biological assessment did not identify significant biological impacts with the proposed fill of wetlands due to their degraded nature. Nonetheless pursuant to RWQCB comments the Modified Subdivision Layout is being analyzed. This alternative would result in a reduction of eight single-family lots and future homes and one future townhome. All other land uses would remain the same as the proposed project alternative. The specific modifications include are summarized below and on Figure 5-1:

- Protect existing drainage channel – without other layout modifications, this would result in the elimination of the playing field, as the drainage bisects the proposed park, but the park could still be developed without the playing field. This would also result in elimination of eight single-family lots (#17, 27, 55, 64, 89, 90, 97, 121).
- Reconfigure project road on northern portion of site so the northern portion of Lot 138 is contiguous to Lots 131 and 132. This would shift three townhomes (nearest to rail corridor) further than 50 feet from rail corridor and provide greater separation from potential rail noise.

#### PROJECT IMPACTS

Alternative 2 would result in some reduction in significant impacts as discussed below, but would not result in new significant impacts.

- Air Quality. The significant impact related to construction particulate emissions would be slightly reduced due to removal of grading with the elimination eight residential lots. However, the overall mass grading of the site would remain largely unchanged, and the significant impact would not be eliminated or substantially reduced. Similarly, significant construction impacts associated with exposure to diesel exhaust and potential exposure to objectionable odors from the City's wastewater pump station would not be substantially reduced with elimination of eight lots.
- Biological Resources. The significant impact related to fill of jurisdictional wetlands would be substantially reduced under this alternative. As indicated above, the alternative would protect nearly 70% of the onsite drainage channel (approximately 0.11 acre). As a result, this alternative would result in the fill of approximately 0.13 acres of seasonal wetlands instead of 0.24 acres with the proposed project. As shown on Figure 4.2-2, these include the onsite wetlands labeled WL-5, WL-6, WL-7, DD-9 (approximately 30%) and the offsite wetlands labeled WL-1. Figure 5-1 provides a layout of the subdivision with the existing wetlands highlighted. In order to maintain wetland features of the retained drainage, it is likely that the drainage from the upper filled drainage would need to be conveyed into the retained portion of the drainage ditch. Potential significant impacts to special status nesting bird species during construction would not be substantially reduced as the project site would still be subject to site preparation and mass grading activities.
- Cultural Resources. The significant impact related to potential discovery of unknown archaeological resources or human burials that may be encountered during construction would be slightly reduced due to removal of grading and site development with the elimination eight residential lots. However, the overall mass grading of the site would remain largely unchanged, and the significant impact would not be eliminated or substantially reduced.
- Geology and Soils. The significant impacts related to exposure to seismic hazards, potential settlement, expansive soils constraints and erosion during construction would be slightly reduced due to the elimination of eight residential lots. Several of the lots to be eliminated are within or adjacent to the location of the suspected old channel meander that is potentially susceptible to localized liquefaction, and thus, exposure to potential liquefaction hazards would be slightly reduced with fewer lots. Settlement, expansive soils and erosion impacts would remain the same. Overall, site development would be slightly reduced, but the significant impacts would not be eliminated or substantially reduced.
- Hazardous Materials. The significant impact related to potential discovery of unknown hazardous materials that may be encountered during construction would be slightly reduced with the elimination eight residential lots. However, the overall mass grading of the site would remain largely unchanged, and the significant impact would not be eliminated or substantially reduced.



- Hydrology and Water Quality. The significant impact related to drainage impacts would occur under any alternative as the stormwater drainage system would need to be sized with adequate capacity to serve all site development. Stormwater runoff would be slightly reduced with the elimination of eight residential lots. Construction-related erosion and water quality impacts would not substantially change as the overall mass grading of the site would continue under any alternative. Post-construction water quality impacts from project stormwater runoff could be slightly reduced under this alternative. The project stormwater mitigation plan identifies bioswales as a means of biofiltration. The protection of most of the onsite drainage channel would allow for more area in which to create these types of swales and filtration systems, while maintaining the jurisdictional wetland associated with the drainage.
- Noise. The significant impact related to exposure to rail noise would be reduced with the elimination of relocation of townhomes closest to the rail corridor. The remaining single-family uses would continue to be subject to roadway noise, primarily from Highway 101 and future roadway noise along Caulfield Lane when the planned future road extension is constructed. Construction noise impacts would largely remain unchanged.
- Traffic. The EIR conservatively identified a potential impact with regards to rail crossing safety if the commencement of SMART operations, including installation of supplemental safety measures, is delayed and the proposed Riverfront project is completed first. In such a situation, the proposed project would be required to install the identified improvements under any alternative, which would mitigate potential safety issues. No other significant traffic impacts were identified. This alternative would result in similar levels of traffic, queuing and delays as described under the proposed alternative.
- Cumulative Impacts. This alternative would reduce cumulative project traffic by approximately 82 daily trips, 6 AM peak hour trips and 9 PM peak hour trips. While, this would result in some reduction to the cumulative intersection impacts identified in the City's General Plan EIR, the level of reduction would not eliminate the significant cumulative impact.

#### ABILITY TO MEET PROJECT OBJECTIVES

This alternative would meet all of the Project Objectives, except that the number of homes would be reduced. The alternative would result in development of 126 single-family lots instead of 134 under the proposed project and 38 townhomes instead of 39. The removal of the Active Park would conflict with objective 5, to provide a pedestrian oriented development. The presence of the play field provides an additional amenity for onsite residences,

employees, and hotel guests. Removal of the play field would require that users travel offsite to seek active park recreational opportunities.

### ALTERNATIVE 3: Reduced Project Size

#### PROJECT CHARACTERISTICS

This alternative would include the same modifications as Alternative 2 with additional changes to protect more wetland areas. As a result, Alternative 3 would protect nearly 90% of the drainage channel (approximately -0.21 acres) and result in the fill of approximately 0.03 acres. It is noted that the biological assessment did not identify significant biological impacts with the proposed fill of wetlands due to their degraded nature. Nonetheless pursuant to RWQCB comments a Reduced Size alternative is being analyzed. This alternative would result in an elimination of 28 single-family lots and three townhomes for a total reduction of 31 residential units, and reduction of office space by 10,000 square feet. All other land uses would remain the same. Specific modifications include:

- Protect existing drainage channel – As with Alternative 2, without other layout modifications, this alternative results in the elimination of the playing field, as the drainage bisects the proposed park, but the park could still be developed without the playing field. This would also result in elimination of eight single-family lots (#17, 27, 55, 64, 89, 90, 97, 121).
- Relocate the southern project road further north by eliminating the southern row of single-family lots (#1-20), which would protect wetland areas and reduce fill encroachment .
- Reduce office space by approximately 10,000 square feet, which would reduce associated parking to avoid fill north of active park.
- Eliminate the townhomes nearest to the railway and provide landscaping buffer and additional set back from railway corridor.

#### PROJECT IMPACTS

Alternative 3 would result in some reduction in significant impacts as discussed below, and would not result in new significant impacts.

- Air Quality. The significant impact related to construction particulate emissions would be further reduced over the proposed project alternative due to removal of grading with the elimination of 30 residential lots and a reduced parking lot for the retail, office and hotel buildings. However, the overall mass grading of the site would remain largely unchanged, and the significant impact would not be eliminated or

substantially reduced. Similarly, significant construction impacts associated with exposure to diesel exhaust and potential exposure to objectionable odors from the City's wastewater pump station would be somewhat reduced with elimination of 30 lots.

- Biological Resources. The significant impact related to fill of jurisdictional wetlands would be substantially reduced under this alternative. The alternative would protect nearly 94% of the onsite drainage channel (approximately 0.15 acres). As a result, this alternative would result in the fill of approximately 0.06 acres of seasonal wetlands instead of 0.24 acres as with the proposed project. As shown on Figure 4.2-2, these include the onsite wetlands labeled WL-5, WL-6, WL-7, and DD-9 (approximately 6%). Figure 5-1 provides a layout of the subdivision with the existing wetlands highlighted, and the southern row of proposed lots would also be eliminated. The northern portion of the drainage channel parallels the road that would serve as the entrance to an offsite emergency access route. In order to maintain wetland features of the retained drainage, it is likely that the drainage from the upper filled drainage would need to be conveyed into the retained portion of the drainage ditch. Potential significant impacts to special status nesting bird species during construction would not be substantially reduced as the project site would still be subject to site preparation and mass grading activities.
- Cultural Resources. The significant impact related to potential discovery of unknown archaeological resources or human burials that may be encountered during construction would be slightly reduced due to removal of grading and site development with the elimination of 30 residential units. However, the overall mass grading of the site would remain largely unchanged, and the significant impact would not be eliminated or substantially reduced.
- Geology and Soils. The significant impact related to exposure to seismic hazards, potential settlement and expansive soils constraints would be slightly reduced due to the elimination of 30 residential units. Several of the lots to be eliminated are within or adjacent to the location of the suspected old channel meander that is potentially susceptible to localized liquefaction, and thus, exposure to potential liquefaction hazards would be slightly reduced with fewer lots. Seven of the southern lots to be eliminated are located in the area of fills greater than two feet. Thus, the significant impact related to exposure to settlement hazards would be slightly reduced. The other significant impacts related to exposure to seismic groundshaking hazards, expansive soils and erosion during construction would not be eliminated or substantially reduced.
- Hazardous Materials. The significant impact related to potential discovery of unknown hazardous materials that may be encountered during construction would be slightly reduced with the elimination 30 residential lots. However, the overall mass

grading of the site would remain largely unchanged, and the potentially significant impact would not be eliminated or substantially reduced.

- Hydrology and Water Quality. The significant impact related to drainage would occur under any alternative as the stormwater drainage system would need to be sized with adequate capacity to serve all site development. Stormwater runoff would be slightly reduced with the elimination of 30 residential lots. Construction-related erosion and water quality impacts would not substantially change as the overall mass grading of the site would continue under any alternative. However, post-construction water quality impacts from project stormwater runoff could be potentially reduced under this alternative. The project stormwater mitigation plan identifies bioswales as a means of biofiltration. The protection of most of the onsite drainage channel would allow for more area in which to create these types of swales and filtration systems, while maintaining the jurisdictional wetlands associated with the drainage. Realignment of the southern road slightly north would also create an additional buffer adjacent to the river park.
- Noise. The significant impact related to exposure to rail noise would be reduced with the elimination of three townhomes closest to the rail corridor. The remaining single-family uses would continue to be subject to roadway noise, primarily from Highway 101 and future roadway noise along Caulfield Lane when the planned future road extension is constructed, although two single-family lots would be eliminated adjacent to Caulfield Lane in the southern portion of the site. Construction noise impacts would largely remain unchanged.
- Traffic. The EIR conservatively identified a potential impact with regards to rail crossing safety if the commencement of SMART operations, including installation of supplemental safety measures, is delayed and the proposed Riverfront project is completed first. In such a situation, the proposed project would be required to install the identified improvements under any alternative, which would mitigate potential safety issues. No other significant traffic impacts were identified. This alternative would result in similar levels of traffic, queuing and delays as described under the proposed alternative.
- Cumulative Impacts. This alternative would reduce cumulative project traffic by approximately 270 daily trips, 22 AM peak hour trips and 29 PM peak hour trips. While, this would result in some reduction to the cumulative intersection impacts identified in the City's General Plan EIR, the level of reduction would not eliminate the significant cumulative impact.

#### ABILITY TO MEET PROJECT OBJECTIVES

This alternative would mostly meet all of the Project Objectives, except that the number of homes and office space would be reduced. The alternative would result in development of 106

single-family lots instead of 134 under the proposed project and 36 townhomes instead of 39. The alternative reduces office space from 60,000 square feet to 50,000 square feet. The reduction in office space would reduce the extent that objectives 3, 4, and 9 regarding small business and employment opportunities are met. The removal of the Active Park would conflict with objective 5, to provide a pedestrian oriented development. The presence of the play field provides an additional amenity for onsite residences, employees, and hotel guests. Removal of the play field would require that users travel offsite to seek active park recreational opportunities.

### **Environmentally Superior Alternative**

According to CEQA Guidelines section 15126.6(e), if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Furthermore, Sections 21002 and 21081 of CEQA require lead agencies to adopt feasible mitigation measures or feasible alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. Where the environmentally superior alternative also is the no project alternative, CEQA Guidelines in Section 15126(d)(4) requires the EIR to identify an environmentally superior alternative from among the other alternatives.

Table 5-1 presents a comparison of project impacts between the proposed project and the alternatives. Alternative 1 – No Project Alternative, would eliminate the identified significant impacts, but would not attain any of the project objectives. Nearly half the identified significant impacts would result during construction and can be mitigated under any alternative, as well as the proposed project. Of the alternatives analyzed, Alternative 3 – “Reduced Project Size”, is considered the environmentally superior alternative of the alternatives reviewed. Alternative 3 would substantially reduce the significant impact to jurisdictional wetlands and would result in some reduction in the severity of other significant impacts. It would meet most project objectives, except it would only partially meet objectives related to employment and promoting a pedestrian-oriented development as the active park would not be able to be developed under either Alternative 2 or 3.

**TABLE 5-1: Comparison of Impacts of Project Alternatives**

Environmental Issue	PP	ALT 1	ALT 2	ALT 3
1. Air Quality 4.1-1 – Construction Dust	S/LS	NI	S/LS	S/LS
2. Air Quality 4.1-3 – Construction Diesel Emissions	S/LS	NI	S/LS	S/LS
3. Air Quality 4.1-3 – Exposure to Odors	S/LS	NI	S/LS	S/LS
4. Biological Resources 4.2-1– Wetland Fill	S/LS	NI	S/LS-	S/LS-
5. Biological Resources 4.2-2– Impacts to Nesting Birds	S/LS	NI	S/LS	S/LS
6. Cultural Resources 4.3-1 & 2 – Discovery During Construction	S/LS	NI	S/LS	S/LS
7. Geology and Soils 4.4-1 – Seismic Hazards	S/LS	NI	S/LS-	S/LS-
8. Geology and Soils 4.4-2 – Settlement Hazards	S/LS	NI	S/LS	S/LS-
9. Geology and Soils 4-4-3– Soils Constraints	S/LS	NI	S/LS	S/LS-
10. Geology and Soils 4-4-4 – Construction Erosion	S/LS	NI	S/LS	S/LS
11. Hazardous Materials – Discovery During Construction	S/LS	NI	S/LS	S/LS
12. Hydrology 4.6-1- Drainage	S/LS	NI	S/LS	S/LS-
13. Hydrology 4.6-2- Water Quality	S/LS	NI	S/LS-	S/LS-
14. Noise 4.7-1– Exposure to Noise Exceeding Standards	S/LS	NI	S/LS-	S/LS-
15. Noise 4.7-5 - Construction	S/LS	NI	S/LS	S/LS
16. Traffic – Rail Safety	S/LS	NI	S/LS	S/LS
17. Cumulative Contribution to Traffic	S/LS	NI	S/LS-	S/LS-
New Significant Impacts		None	None	None
<b>Notes:</b>				
PP = Proposed Project				
ALT1 = No Project Alternative				
ALT2 = Modified Subdivision Layout				
ALT3 = Modified Subdivision & Land Use Mix				
Impact without Mitigation / Impact with Mitigation				
NI = No Impact				
LS = Less than significant impact				
S = Significant				
SU = Significant unavoidable impact				
+ = Greater adverse impact than proposed project				
- = Lesser adverse impact than proposed project				