

## **5. Alternatives to the Proposed Project**

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The following discussion is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any of the significant effects of the proposed project. The California Environmental Quality Act (CEQA) Guidelines set forth the intent and extent of alternatives analysis to be provided in an environmental impact report (EIR). Section 15126.6(a) of the CEQA Guidelines states that:

*An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a 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 project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.*

### **5.1 PURPOSE**

The alternatives evaluated in this Draft EIR were developed consistent with Section 15126.6(b) of the CEQA Guidelines, which states that:

*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.*

### **5.2 PROJECT OBJECTIVES**

As stated above, the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the proposed project. As listed in Chapter 3, Project Description, of this Draft EIR, the primary purposes of the proposed project are to plan for the growth and conservation of San Rafael over a 20-year time horizon and to achieve a more equitable, sustainable, and prosperous future for all residents. Objectives related specifically to growth include focusing growth in the Downtown Precise Plan Area, capitalizing on transit opportunities in and around Priority Development Areas (PDAs), and streamlining future development that is consistent with the proposed project. This

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requires extending the buildout horizon to year 2040 and updating goals, policies, and programs so that they meet current State requirements and community priorities. As part of this process, the City drafted 2040 Guiding Principles, which build upon the framework of the vision, guiding principles, and goals of the current General Plan 2020 and reflect the community's desires for San Rafael's future. The draft 2040 Guiding Principles will serve as the project objectives for the EIR. The Guiding Principles are organized in six distinct categories, as listed here and shown on Figure 3-4 in Chapter 3, Project Description, of this Draft EIR.

- **Adapting to the Future.** These principles include preparing for climate change, living green and sustainably, restoring natural systems, being prepared for disasters, embracing innovation, adapting to economic shifts, creating great public spaces, and accommodating change.
- **Economic Vitality.** These principles include investing in education, creating a positive business climate, promoting a thriving downtown, supporting entrepreneurship, encouraging diverse job growth, sustaining a healthy tax base, improving transportation and infrastructure, and nurturing arts and entertainment.
- **Opportunity for All.** These principles include reducing income inequality, ending homelessness, integrating diverse cultures, improving health and wellness, supporting educational excellence, and ensuring environmental justice.
- **Housing Our Growing Community.** These principles include conserving and modernizing existing housing, building more housing, increasing housing choices for the local workforce, meeting special housing needs, encouraging aging in community, improving housing affordability, and treating all residents fairly.
- **Mobility.** These principles include effectively managing congestion, improving bicycle and pedestrian modes, enhancing public transit, reducing neighborhood conflicts, improving safety for all modes of transportation, and using technology to improve efficiency.
- **Building on Our Foundation.** These principles recognize the City's strengths and its legacy of conserving open space, sustaining great neighborhoods, revitalizing Downtown, maintaining a strong sense of place, preserving its history, and providing quality public services.

## 5.3 SELECTION OF A REASONABLE RANGE OF ALTERNATIVES

Section 15126.6(c) of the CEQA Guidelines states:

*The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.*

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### 5.3.1 ALTERNATIVES ANALYSIS

Three project alternatives and the comparative merits of the alternatives are discussed in this section in accordance with the CEQA Guidelines. All the potential environmental impacts associated with adoption and implementation of the proposed project were found to be either less than significant without mitigation or less than significant with mitigation, except for impacts to air quality, greenhouse gas emissions, cultural resources (historic buildings), and transportation, which were found to be significant and unavoidable with mitigation measures at the program level. These significant and unavoidable impacts include the following:

- **Impact AIR-2.2:** Operational activities associated with potential future development could cumulatively contribute to the non-attainment designations of the San Francisco Bay Area Air Basin.
- **Impact AIR-3.2.** Operational activities associated with potential future development could expose sensitive receptors to substantial toxic air contaminant concentrations from nonpermitted sources.
- **Impact CULT-1.** Future development in San Rafael on sites that contain a historic resource may cause the demolition, destruction, or alteration of a historic resource such that the significance of the resource is "materially impaired." Such adverse changes or potential adverse changes in the significance of a CEQA-defined historic resource would constitute a significant impact.
- **Impact GHG-1:** Implementation of the proposed project may not meet the long-term GHG reduction goal under Executive Order S-03-05.
- **Impact TRAN-1a** Implementation of the proposed project would result in a significant land use VMT impact for Total VMT and Work VMT due to forecast land use growth through 2040, based on a comparison of the VMT rate increment for Total VMT Per Service Population and Work VMT Per Employee to the corresponding average baseline rates for the full nine-county Bay Area.
- **Impact TRAN-1b:** Implementation of the proposed project would result in a significant road network VMT impact due to the planned capacity of the roadway system.
- **Impact TRAN-6:** Implementation of the proposed project would cumulatively contribute to regional VMT.

The alternatives were selected because of their potential to further reduce and avoid these impacts. The alternatives to be analyzed in comparison to the proposed project include:

- Alternative A: No Project Alternative (Current General Plan)
- Alternative B: Greater Residential Growth
- Alternative C: Lower Residential Growth

The first alternative is the CEQA-required "No Project" Alternative, which assumes the current General Plan 2020 is carried through instead of the proposed project. Alternative B assumes more households, housing units, and population, and slightly fewer jobs, when compared to the proposed project. Alternative C assumes fewer households, housing units, and population, and a slightly greater number of jobs when compared to the proposed project.

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### 5.3.2 ASSUMPTIONS AND METHODOLOGY

The alternatives analysis is presented as a comparative analysis to the proposed project. The development intensity for the alternatives varies from the proposed project. The estimated growth under each alternative, as well as the proposed project, is provided in Table 5-1.

**TABLE 5-1 FORECASTED ADDITIONAL GROWTH FOR THE PROPOSED PROJECT AND ALTERNATIVES TO THE PROPOSED PROJECT**

Category	Proposed Project	Alternative A: No Project	Alternative B: Greater Residential Growth	Alternative C: Lower Residential Growth
<b>DOWNTOWN PRECISE PLAN AREA</b>				
Households	2,100	340	2,550	1,535
Residential Units	2,200	360	2,690	1,615
Population	3,570	800	4,335	2,610
Jobs	2,020	435	2,000	2,050
<b>REMAINDER OF EIR STUDY AREA</b>				
Households	2,150	1,375	3,280	1,325
Residential Units	2,260	1,455	3,440	1,390
Population	5,340	2,615	8,165	3,215
Jobs	2,095	5,310	1,915	2,190
<b>TOTAL EIR STUDY AREA</b>				
<i>Households</i>	<b>4,250</b>	<b>1,715</b>	<b>5,830</b>	<b>2,860</b>
<i>Residential Units</i>	<b>4,460</b>	<b>1,815</b>	<b>6,130</b>	<b>3,005</b>
<i>Population</i>	<b>8,910</b>	<b>3,415</b>	<b>12,500</b>	<b>5,825</b>
<i>Jobs</i>	<b>4,115</b>	<b>5,745<sup>a</sup></b>	<b>3,915</b>	<b>4,240</b>

Note:

<sup>a</sup> This figure represents the increment of job growth shown in the Transportation Authority of Marin's traffic model which is based on regional forecasts that will be outdated as soon as *Plan Bay Area 2050* is adopted. This figure is not the increment of job growth assumed in General Plan 2020. Most of the job growth assumed in General Plan 2020 has already occurred. Therefore, this is a reasonable assumption about what would occur in the No Project conditions (CEQA Guidelines Section 15126.6(e)(3)(C)).

Source: City of San Rafael, 2020.

The alternatives analysis assumes that all applicable mitigation measures recommended for the proposed project and the proposed General Plan 2040 goals, policies, and programs would apply to Alternatives B and C, but would not apply to Alternative A. The following discussion compares the environmental impacts of the alternatives with those of the proposed project for each of the environmental topics analyzed in detail in Chapter 4, Environmental Analysis, of this Draft EIR. The impacts of each alternative are classified as fewer, similar to (or comparable to), or greater than the level of impacts associated with the proposed project. Table 5-2 summarizes the relative impacts of each of the alternatives compared to the proposed project.

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**TABLE 5-2 COMPARISON OF IMPACTS OF THE PROJECT ALTERNATIVES AND THE PROPOSED PROJECT**

Topic	Proposed Project <sup>a</sup>	Alternative A: No Project	Alternative B: Greater Residential Growth	Alternative C: Lower Residential Growth
Aesthetics	LTS	<	=	<
Agriculture and Forestry Resources	LTS	=	=	=
Air Quality	SU	>	<	>
Biological Resources	LTS/M	>	=	=
Cultural and Tribal Cultural Resources	SU	>	>	<
Energy	LTS	>	=	>
Geology and Soils	LTS	=	=	=
Greenhouse Gas Emissions	SU	>	<	>
Hazards and Hazardous Materials	LTS/M	=	=	=
Hydrology and Water Quality	LTS	=	=	=
Land Use and Planning	LTS	=	=	=
Mineral Resources	LTS	=	=	=
Noise	SU	>	<	=
Population and Housing	LTS	=	=	=
Public Services and Recreation	LTS	<	>	<
Transportation	SU	>	<	>
Utilities and Service Systems	LTS	<	>	<
Wildfire	LTS	=	=	=

Notes:

<sup>a</sup>. The impacts listed in this column represent the highest significance determination for each respective standard of significance.

LTS	Less Than Significant	<	Less impacts in comparison to the proposed project
LTS/M	Less Than Significant with Mitigation	=	Similar impacts in comparison to the proposed project
SU	Significant and Unavoidable	>	Greater impact in comparison to the proposed project

## 5.4 ALTERNATIVE A: NO PROJECT (CURRENT GENERAL PLAN)

### 5.4.1 DESCRIPTION

Pursuant to CEQA Guidelines Section 15126.6(e)(1), the No Project Alternative is required as part of the “reasonable range of alternatives” to allow decision makers to compare the impacts of approving the proposed project with the impacts of taking no action or not approving the proposed project. Consistent with CEQA Guidelines Section 15126.6(e)(3)(A), when the project is the revision of a plan, as in this case, the no project alternative will be the continuation of the existing plan. Under Alternative A, potential future development in San Rafael would continue to be subject to existing policies, regulations, development standards, and land use designations of the existing General Plan 2020 and Zoning Code.

As described in Chapter 3, Project Description, of this Draft EIR, the existing General Plan 2020 involved a major overhaul and modernization of the prior General Plan 2000 that was adopted in 1988. The City determined that General Plan 2020 provided a good foundation for the proposed General Plan 2040. General Plan 2020 went through a comprehensive review process, resulting in a broad range of community goals and policies. Many of the community issues vetted in General Plan 2020 are still relevant, well addressed, and do not require major changes. Therefore, while the proposed General Plan

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2040 is not a major departure from General Plan 2020 in terms of its underlying vision and fundamental growth concepts, Alternative A would not incorporate the topics that are now required by State law and would not revise relevant policies and programs to meet those requirements.

Pursuant to CEQA Guidelines Section 15126.6(e)(3)(C), the City of San Rafael, acting as the lead agency, should analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services. Implementation of the No Project Alternative assumes that development growth throughout the city would remain unchanged until the buildout horizon year 2040, which is consistent with other regional plans, including *Plan Bay Area 2040*.

Future development permitted under the No Project Alternative would not increase development potential in San Rafael beyond what was considered in the existing General Plan 2020 and analyzed in the associated EIR (State Clearinghouse No. 2003052031), but rather assumes the remaining development growth shown in Table 5-1 would occur through 2040. No General Plan land use designations or Zoning District changes would be required to accommodate these uses. Table 5-3 shows the difference between 2020 to 2040 growth of the proposed project compared to Alternative A. As shown in Table 5-3, Alternative A would result in less residential growth and more job growth when compared to the proposed project.

**TABLE 5-3 2020 TO 2040 GROWTH UNDER THE PROPOSED PROJECT AND ALTERNATIVE A**

Category	Proposed Project	Alternative A: No Project	Change between the Proposed Project and Alternative A
<b>Downtown Precise Plan Area</b>			
Households	2,100	340	1,760 fewer households
Residential Units	2,200	360	1,840 fewer residential units
Population	3,570	800	2,770 fewer population
Jobs	2,020	435	1,585 fewer jobs
<b>Remainder of EIR Study Area</b>			
Households	2,150	1,375	775 fewer households
Residential Units	2,260	1,455	805 fewer residential units
Population	5,340	2,615	2,725 fewer population
Jobs	2,095	5,310	3,215 more jobs
<b>Total EIR Study Area</b>			
Households	<b>4,250</b>	<b>1,715</b>	<b>2,535 fewer households</b>
Residential Units	<b>4,460</b>	<b>1,815</b>	<b>2,645 fewer residential units</b>
Population	<b>8,910</b>	<b>3,415</b>	<b>5,495 fewer population</b>
Jobs	<b>4,115</b>	<b>5,745<sup>a</sup></b>	<b>1,630 more jobs</b>

Note:

<sup>a</sup> This figure represents the increment of job growth shown in the Transportation Authority of Marin's traffic model, which is based on regional forecasts that will be outdated as soon as *Plan Bay Area 2050* is adopted. This figure is not the increment of job growth assumed in General Plan 2020. Most of the job growth assumed in General Plan 2020 has already occurred. Therefore, this is a reasonable assumption about what would occur in the No Project conditions (CEQA Guidelines Section 15126.6(e)(3)(C)).

Source: City of San Rafael, 2020.

Alternative A would not include the Downtown Precise Plan, which updates the 1993 *Our Vision of Downtown San Rafael and Our Implementation Strategy* (1993 Downtown Vision) and incorporates key

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recommendations of the 2012 *San Rafael Downtown Station Area Plan*, as well as the 2017 *Downtown Parking and Wayfinding Study*, and other more focused projects, such as the 2019 *Third Street Rehabilitation Project* and the 2018 *Third and Hetherton Intersection Improvements*. The urban design, placemaking, historic preservation, transportation, parking, economic development, affordable housing, and antidisplacement strategies included in the Downtown Precise Plan would not be realized in Alternative A.

The alternatives analysis assumes that none of the applicable mitigation measures recommended for the proposed project would apply to Alternative A.

### 5.4.2 IMPACT DISCUSSION

The potential environmental impacts associated with Alternative A when compared to the proposed project are described herein.

#### 5.4.2.1 AESTHETICS

As described in Chapter 4.1, Aesthetics, of this Draft EIR, the proposed project would not result in any significant impacts related to aesthetics and no mitigation measures are required.

Like the proposed project, potential future development in the EIR Study Area under Alternative A is anticipated to occur in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, where future development would have a lesser impact on scenic vistas. The proposed General Plan 2040 does not include any new land use changes that would increase building height beyond what is previously accounted for under the current General Plan 2020, but would increase maximum height limits in the Downtown Precise Plan Area as part of the proposed Downtown Code. These changes would not be realized under Alternative A. While the areas of potential change under the proposed project are developed with a mix of buildings that range from 1 to 10 stories in height and views would continue to be visible between elements of the existing built environment and over lower-intensity areas, less development potentially obstructing views would occur and impacts to views of the existing scenic resources would be *less* when compared to the proposed project.

There are no State-designated scenic highways within, or in the vicinity of, the EIR Study Area. Therefore, implementation of either scenario would not damage existing scenic resources within a state scenic highway and impacts would be *similar*.

Applicable future projects under both scenarios would be subject to design review prior to project approval pursuant to San Rafael Municipal Code (SRMC) Chapter 14.25, Major Environmental and Design Review Permits, and comply with the various planning documents that govern scenic quality in the city, as described in Section 4.1.1, Regulatory Framework, in Chapter 4.1. However, Alternative A would not realize the proposed Community Design and Preservation Element that was reorganized as part of the proposed General Plan 2040 update to address five primary goals: a beautiful city, a sense of place, an improved public realm, quality construction and design, and protected cultural heritage. The policies emphasize protection of natural features, views, and the waterfront; improvements to gateways and

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corridors; and upgrades to plazas, public spaces, and streetscapes. This element also covers street trees, landscaping, and wayfinding signage more comprehensively than General Plan 2020. Furthermore, principles of good design have been incorporated into the proposed project. Thus, unlike the proposed project, which includes these new policies, development under this alternative would not provide the same level of design consideration related to the visual character or quality of a project site and its surrounding; thus, aesthetic impacts related to these topics would be *greater* than those of the proposed project.

Similar to the proposed project, Alternative A would result in new lighting sources that could result in sources of glare. Potential future development under both scenarios would be required to comply with best management practices in CALGreen and SRMC provisions that ensure new land uses do not generate excessive light levels and reduce light and glare spillover from future development to surrounding land uses. Because Alternative A would result in less development than the proposed project, fewer impacts related to light or glare would occur and impacts would be *less* when compared to the proposed project.

Overall, development in the EIR Study Area under Alternative A would be less and would be guided by the current policies and regulations that guide development in San Rafael, and impacts related to aesthetics would be *less* when compared to the proposed project.

### 5.4.2.2 AGRICULTURE AND FORESTRY RESOURCES

As determined in Chapter 4.2, Agriculture and Forestry Resources, the proposed project would result in less-than-significant impacts to agricultural resources and no impacts to forest resources. No mitigation measures are required.

The EIR Study Area does not have any land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor are there any lands under an active Williamson Act Contract or zoned for forestry, timberland, or timberland production. The California Department of Conservation has designated approximately 2,000 acres of land as Farmland of Local Importance in the EIR Study Area, specifically used as grazing, in the northern unincorporated portion of the EIR Study Area.

The proposed project includes Policy LU-1.5, Development Beyond the Urban Service Area, which serves to retain areas outside of San Rafael's Urban Service Area boundary, but within the Planning Area, as agricultural or open space uses. Policy LU-1.5 would ensure that potential future development under implementation of the proposed project would not result in the conversion of Farmland of Local Importance in the EIR Study Area. Alternative A would continue to allow development under the existing General Plan 2020, which does not contain any goals, policies, or programs that address agricultural land in the EIR Study Area. However, the existing General Plan 2020 encourages development to occur in existing urbanized areas, which would reduce the likelihood that future development under Alternative A would occur in a location that would adversely impact agricultural land. Therefore, impacts would be *similar* under Alternative A when compared to the proposed project.



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As described in Chapter 4.3, Air Quality, of this Draft EIR, the proposed project would result in significant and unavoidable impacts during the operational phase even with implementation of Mitigation Measures AIR-2.2 and AIR-3.2. Implementation of Mitigation Measure AIR-2.1 3.1a, and AIR-3.1b, would reduce significant impact from construction to a less-than-significant level.

As described in Chapter 4.3, Air Quality, of this Draft EIR, implementation of the proposed project would not conflict with the 2017 *Clean Air Plan*, would pose no operational community risks or hazards, and would not generate any substantial odors. However, at a program level, implementation of the proposed project would result in significant and unavoidable impacts related to construction and operation of potential future development, as well as the cumulative contribution to the non-attainment designations of the San Francisco Bay Area Air Basin.

Alternative A would continue development as allowed under the existing General Plan 2020, which would result in less redevelopment in the EIR Study Area. Development under both scenarios would be subject to the Bay Area Air Quality Management District's (BAAQMD's) basic control measures for fugitive dust control and screening sizes. Additionally, future development under both scenarios could result in construction activities within 1,000 feet of residential and other sensitive land uses, thus, temporarily elevating concentrations of toxic air contaminants and diesel-PM<sub>2.5</sub> in the vicinity of sensitive land uses. While the regulatory setting mitigating construction impacts is the same, less development would occur under Alternative A; therefore, construction impacts would be *less* when compared to the proposed project.

Under Alternative A, reduced development would occur; therefore, less direct and indirect criteria air pollutant emissions from energy (e.g., natural gas use), and area sources (e.g., aerosols and landscaping equipment) would occur. Under both scenarios, subsequent environmental review of applicable development projects would be required to assess potential impacts under BAAQMD's project-level thresholds. As demonstrated in Chapter 4.16, Transportation, the Total Vehicle Miles Traveled (VMT) Per Service Population and Work VMT Per Employee would be *greater* under Alternative A than the proposed project (29.5 Total VMT Per Capita compared to 28.1 Total VMT Per Capita and 17.5 Work VMT Per Employee compared to 16.9 Work VMT Per Employee). This is because the proposed project includes greater infill development in the PDAs and Transit Priority Areas (TPA), which would reduce VMT from automobiles. Alternative A would not include the goals, policies, and programs in the proposed project, which would concentrate development in existing urban areas and therefore could lessen the net benefit gained from siting future development near public transit and existing services. Therefore, as a result of reducing development, Alternative A would not necessarily reduce trips, which are the major source of criteria air pollutants from the proposed project. Therefore, while Alternative A would result in less overall development than the proposed project, air quality impacts from the operation of these uses would be considered *greater* when compared to the proposed project.

Same as the proposed project, Alternative A is not the type of project that would result in significant impacts from odor and impacts would be *similar* under both scenarios.

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Overall, because Alternative A would result in less infill development that would create a higher VMT per capita, air quality impacts under Alternative A would be *greater* when compared to the proposed project.

### 5.4.2.4 BIOLOGICAL RESOURCES

As described in Chapter 4.4, Biological Resources, of this Draft EIR, the proposed project would result in less-than-significant impacts to biological resources with implementation of Mitigation Measures BIO-1 through BIO-4.

The EIR Study Area is not within any local, regional, or State habitat conservation plan areas. Therefore, neither scenario would conflict with the conservation strategy in any Habitat Conservation Plan or Natural Community Conservation Plan and impacts would be *similar*.

The City of San Rafael General Plan is the primary planning document for the City of San Rafael. The existing General Plan 2020 and the proposed revisions to policies and programs under the Conservation and Climate Change (C) Element are intended to ensure consistency between the General Plan and Zoning Ordinance and would not conflict with local policies and ordinances protecting biological resources because the General Plan is the overriding planning document for San Rafael. Accordingly, impacts to biological resources under Alternative A would be *similar* when compared to the proposed project.

Although potential future development under the proposed project could potentially affect animal and plant species identified as candidate, sensitive, or special-status species, proposed goals, policies, and programs; proposed mitigation measures; and adherence to all federal, State, and local regulations relating to biological resources would fully mitigate any potential impacts. The proposed project would also have a less-than-significant impact on riparian habitats, wetlands, and wildlife movement corridors because compliance with proposed goals, policies, and programs; proposed mitigation measures; and adherence to all federal, State, and local regulations relating to biological resources would fully mitigate any potential impacts. Further, potential future development under the proposed project would primarily occur as infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, which reduces the likelihood that special-status plant and animal species could be impacted. Infill development also reduces the likelihood that the riparian habitats, wetlands, and wildlife movement corridors could be impacted.

The existing General Plan 2020 encourages development to occur in existing urbanized areas, which would mean that Alternative A would also reduce the likelihood of development in areas of the EIR Study Area that are more likely to cause an adverse impact to a sensitive riparian habitat, wetland, or wildlife movement corridor. Mitigation Measure BIO-1 requires that as part of the discretionary review process for development projects in the EIR Study Area, the City shall require all project applicants to prepare and submit project-specific baseline biological resources assessments (BRA) if the project site(s) contain natural habitat with features that could support special-status species and other sensitive biological resources, as well as active nests of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code. No similar requirement currently exists in the General Plan 2020 conditions and these standards would not be realized under the Alternative A scenario; therefore, impacts would be *greater* when compared to the proposed project.

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The proposed project could introduce taller buildings in the Downtown Precise Plan Area, which would increase impacts to birds resulting from colliding into buildings when compared to Alternative A. However, tall buildings subjecting birds to collision would occur under either scenario. The proposed project's potential bird collision impacts would be fully mitigated with implementation of Mitigation Measure BIO-4b, which would set standards for potential future development involving buildings exceeding 5,000 square feet or structures taller than 30 feet tall. These standards would not be realized under the Alternative A scenario; therefore, impacts would be *greater* when compared to the proposed project.

In summary, impacts to biological resources from potential future development as allowed under Alternative A would be *greater* when compared to the proposed project.

### 5.4.2.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

As described in Chapter 4.5, Cultural and Tribal Cultural Resources, of this Draft EIR, the proposed project would result in less-than-significant impacts to cultural and tribal cultural resources with implementation of Mitigation Measures CULT-2 through CULT-4 and would result in a significant and unavoidable impact with implementation of Mitigation Measure CULT-1.

Under Alternative A, new development would continue throughout the city under existing plans and regulations. As explained in Chapter 4.5, there are existing prehistoric, architectural, historical, or archaeological resources in the EIR Study Area that could all be impacted by new demolition, inappropriate modification, or inappropriate new construction under the proposed project or Alternative A. Like the proposed project, Alternative A would be subject to the procedures of conduct following the discovery of human remains set forth in California Health and Safety Code, Public Resources Code and the California Code of Regulations. Because less development would occur under the Alternative A scenario, the potential to impact these resources would be *less* when compared to the proposed project. However, the proposed project includes Mitigation Measures which require the proposed General Plan 2040 to adopt additional programs that would further protect historic resources in the EIR Study Area. Under Alternative A, these programs would not be adopted. Therefore, Alternative A would have *greater* impacts to cultural resources as compared to the proposed project when following common protocols.

### 5.4.2.6 ENERGY

As described in Chapter 4.6, Energy, of this Draft EIR, the proposed project would not result in any significant impacts related to energy and no mitigation measures are required.

All development that occurs in the State is required to comply with best management practices regulated in the 2019 California Green Building Code and 2019 Building and Energy Efficiency Standards, which ensure new development would not result in the wasteful or inefficient use of energy. Further, new development would automatically be enrolled in renewable energy supplied by Marin Clean Energy. Such requirements and enrollment in MCE would be required under both the proposed project and under Alternative A. Additionally, neither the proposed project nor Alternative A would introduce a level of development and population growth that would be anticipated to necessitate the construction of new energy supply facilities or transmission infrastructure.

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Less development would occur under the Alternative A scenario, so energy consumption from construction would be *less* when compared to the proposed project. However, newer buildings would be more energy efficient, thus energy impacts from buildings would be less energy efficient under Alternative A when compared to the proposed project. Ultimately, as described in the air quality discussion, energy use from VMT would be greater under Alternative A because less infill development in PDAs and TPAs would occur when compared to the proposed project. Therefore, overall energy demand and consumption would be *greater* under Alternative A when compared to the proposed project.

### 5.4.2.7 GEOLOGY AND SOILS

As described in Chapter 4.7, Geology and Soils, of this Draft EIR, the proposed project would result in less-than-significant impacts related to geology and soils with implementation of Mitigation Measure GEO-6.

Future development under both Alternative A and the proposed project would be subject to the same federal, State, and local regulations that address and prevent hazards associated with geology, soils, and seismicity. Both General Plan 2020 and proposed General Plan 2040 encourage development in urbanized settings where there is less likelihood for impacts from geologic hazards to occur. Although Alternative A would result in less overall development, compliance with existing regulations related to geologic and seismic safety would apply similarly to both future development under Alternative A and the proposed project; therefore, Alternative A would result in *similar* impacts when compared to the proposed project.

### 5.4.2.8 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.8, Greenhouse Gas Emissions, of this Draft EIR, the proposed project would result in two significant and unavoidable impacts despite implementation of Mitigation Measures GHG-1.

Implementation of the proposed project would result in significant and unavoidable greenhouse gas (GHG) emissions impacts when applying program-level thresholds for the forecast year 2040. With respect to GHG emissions from construction, new buildings constructed would be subject to the triennial updates to California's Building and Energy Efficiency Standards, which would presumably improve over time. While new buildings would be more energy efficient, there would be an overall increase in energy usage under the proposed project from construction due to the amount of proposed growth. Even with implementation of the 2017 Scoping Plan, the 2050 target identified under Executive Order S-03-05, is estimated to not be achievable without major advances in technology. The identification of these program-level impacts does not preclude the finding of less-than-significant impacts for subsequent projects that comply with BAAQMD screening criteria or meet applicable thresholds of significance.

Alternative A would not necessarily result in a concentration of development and redevelopment in the Downtown Precise Plan and other urban portions of the EIR Study Area. Reducing development in the Downtown Precise Plan Area specifically could lessen the net benefit gained from siting more intense infill near public transit and result in a higher percentage of transit users that may rely on automobiles (as opposed to walking or biking). Therefore, as a result of reducing infill development near transit, Alternative A would not necessarily reduce trips, which are the major source of criteria GHG emissions from the proposed project. As described in the air quality discussion, the transportation sector is the greatest emitter of air pollutants, which also include GHG emissions. Therefore, because greater Total

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VMT Per Capita and Work VMT Per Employee would occur under Alternative A, impacts related to GHG emissions would be *greater* when compared to the proposed project.

Overall, impacts from GHG emissions under Alternative A would be *greater* when compared to the proposed project.

### 5.4.2.9 HAZARDS AND HAZARDOUS MATERIALS

As described in Chapter 4.9, Hazards and Hazardous Materials, of this Draft EIR, the proposed project would result in less-than-significant impacts related to hazards and hazardous materials with implementation of Mitigation Measure HAZ-4.

As discussed in Chapter 4.9, Hazards and Hazardous Materials, of this Draft EIR, there are sites within the EIR Study Area and the Downtown Precise Plan Area that are included on a list of hazardous materials sites. Impact Discussion HAZ-4 of this Draft EIR concluded that implementation of the proposed project could result in construction and operation activities on sites with known hazardous materials and, as a result, create a significant hazard to the public or the environment. However, such impacts were deemed less-than-significant with the adoption of mitigation measures. Alternative A would occur as projected in the existing General Plan 2020. General Plan 2020 includes policies that were evaluated in the General Plan 2020 EIR as reducing the impact of locating future development on sites with known hazardous materials as less than significant. Policies of General Plan 2020 require potential future development abide by federal and State law and follow best management practices related to hazards and hazardous materials. Accordingly, Alternative A would have a *similar* impact when compared to the proposed project.

The proposed project was found to have a less-than-significant impact related to the routine transport, use, or disposal of hazardous waste, the release of hazardous waste, or the emitting of hazardous emissions or handling of hazardous materials in the proximity of an existing or proposed school. As further discussed in Chapter 4.9, Hazards and Hazardous Materials, the EIR Study Area is not located within an airport land use plan area for which potential future development could conflict, and implementation of the proposed project would not conflict with an adopted emergency response plan or emergency evacuation plan. Potential future development that could occur in the EIR Study Area from implementation of the proposed project would be required to comply with all federal, State, and local regulations pertaining to hazards and hazardous materials, and the proposed project includes goals, policies, and programs that would further reduce impacts related to hazardous materials. Development that would occur under Alternative A would be required to comply with the same federal and State regulations and would be required to comply with policies in the existing General Plan 2020, which reduce impacts related to hazardous materials. Therefore, Alternative A would have a *similar* impact when compared to the proposed project.

### 5.4.2.10 HYDROLOGY AND WATER QUALITY

As described in Chapter 4.10, Hydrology and Water Quality, of this Draft EIR, the proposed project would not result in any significant impacts related to hydrology and water quality and no mitigation measures are required. Compliance with existing State and local regulations and procedures would ensure that pre-

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and post-construction impacts to water quality would be less than significant. These regulations and procedures would be maintained under Alternative A.

Although Alternative A would result in less development overall, future development would likely occur within previously urbanized areas and would connect to existing drainage systems already in place and be subject to the same existing federal, State, and local regulations relating to hydrology and water quality, similar to the proposed project. Compliance with existing regulations would ensure that pre- and post-construction impacts to water quality be minimized as future development occurs. While the proposed project has updated and expanded the General Plan 2020 goals, policies, and programs related to hydrology and water quality, impacts to hydrology and water quality were found to be less-than-significant in the General Plan 2020 EIR, which suggests that existing General Plan 2020 policies would ensure future development would not have a hydrology or water quality impact on the environment. Because Alternative A involves continuing implementation of General Plan 2020, and because implementation of General Plan 2020 was found to have less-than-significant impacts on hydrology and water quality, Alternative A would have *similar* impacts to hydrology and water quality when compared to the proposed project.

### 5.4.2.11 LAND USE AND PLANNING

As described in Chapter 4.11, Land Use and Planning, of this Draft EIR, the proposed project would not result in any significant impacts related to land use and planning and no mitigation measures are required.

The existing General Plan 2020 was adopted with the purpose of harmonizing changes to existing developed areas in order to better serve community needs. While the proposed project would aim to improve connectivity and would not create physical barriers within existing communities, Alternative A would also support the integration of infill development and does not propose physical features that could divide a community. Accordingly, impacts would be *similar* under both scenarios.

Under Alternative A, development would continue to occur throughout the EIR Study Area under the existing General Plan 2020 and Zoning Code and would not conflict with these already approved standards. However, Alternative A would not result in implementation of the Downtown Precise Plan which would establish a detailed vision for the Downtown Precise Plan Area to guide future development. As discussed in Chapter 3, Project Description, of this Draft EIR, implementation of the Downtown Precise Plan would result in the adoption of a Downtown Code, which would amend the existing SRMC Zoning Code. The Downtown Code would be form-based, which means that the physical design of development would be heavily regulated while the land uses within the Downtown Precise Plan Area are not specifically regulated and are instead driven by market forces. Nonetheless, implementation of either development scenarios would not conflict with any applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be *similar*.

### 5.4.2.12 MINERAL RESOURCES

As described in Chapter 4.12, Mineral Resources, of this Draft EIR, the proposed project would not result in any significant impacts related to mineral resources and no mitigation measures are required.

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As discussed in Chapter 4.12, Mineral Resources, of this Draft EIR, the San Rafael Rock Quarry and McNear Brickworks are the only designated mineral resource sites with local, regional, or State significance within the EIR Study Area. The site is located outside of the San Rafael city limits, but within the EIR Study Area. The proposed project was found to have a less-than-significant impact on the San Rafael Rock Quarry and McNear Brickworks because potential future development under the proposed project would occur in existing urbanized areas not located near the mineral resource site. Future development under Alternative A would occur in the locations discussed in the existing General Plan 2020, which include already urbanized portions of the EIR Study Area that would not result in an impact to the mineral resource site. Therefore, impacts to mineral resources would be *similar* to the proposed project under Alternative A.

### 5.4.2.13 NOISE AND VIBRATION

As described in Chapter 4.13, Noise and Vibration, of this Draft EIR, the proposed project would result in a less-than-significant impact with implementation of Mitigation Measures NOISE-1, NOISE-2a, and NOISE-2b.

Future development allowed under the proposed project would be subject to the standards of the SRMC and existing General Plan 2020, including those relating to the interface between residential and non-residential land uses. As specific uses are proposed for particular sites, project-level design, permitting, and/or environmental review would serve to ensure that individual uses would comply with the noise regulations. Future development under Alternative A would also be subject to these applicable standards. Because less construction would occur, noise and vibration from construction would be less under Alternative A when compared to the proposed project.

Alternative A would result in less development but would generate more Total VMT Per Capita and Work VMT Per Employee, which potentially generate more mobile sources of noise. Because construction is temporary, the increased noise impacts from the operational phase would result in *greater* noise impacts under Alternative A when compared to the proposed project.

### 5.4.2.14 POPULATION AND HOUSING

As described in Chapter 4.14, Population and Housing, of this Draft EIR, the proposed project would not result in any significant impacts related to population and housing, and no mitigation measures are required.

As described in Chapter 4.14, Population and Housing, of this Draft EIR, implementation of the proposed project would slightly exceed current regional projections. However, implementation of the proposed project was found to have a less-than-significant impact due to the focus on infill development in PDAs and TPAs, which is in alignment with the regional planning framework of *Plan Bay Area*. Further, the proposed project is the overriding policy document in the EIR Study Area, which plans for population growth that is reasonably foreseeable through 2040.

Alternative A would result in less population and housing; thus, the regional projections would not be exceeded under this scenario. However, Alternative A would not include the updated policy framework of

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the proposed project that ensure adequate planning occurs to accommodate the future population increase and future development to extended buildout year through 2040. Therefore, impacts under Alternative A would be *greater* when compared to those under the proposed project.

Although less than the proposed project, Alternative A would allow a net increase of residential and non-residential uses in the EIR Study Area through 2040. Since implementation of Alternative A would result in a net increase in housing, like the proposed project, it would not require replacement housing outside the EIR Study Area. Therefore, impacts under Alternative A would be *similar* when compared to those of the proposed project.

In summary, while Alternative A would result in a different growth potential, impacts related to population and housing would be *similar* when compared to the proposed project.

### 5.4.2.15 PUBLIC SERVICES AND RECREATION

As described in Chapter 4.15, Public Services and Recreation, of this Draft EIR, impacts under the proposed project to fire protection services, police services, parks, schools, and libraries were found to be less than significant. No mitigation measures are required.

Alternative A would result in fewer new residents and jobs to the EIR Study Area, and therefore, would result in less demand on the public service providers that serve the EIR Study Area. Potential future development under Alternative A would be required to comply with all existing City regulations adopted to ensure that development pays its fair share of the cost of delivering services, providing park space and libraries, while payment of property taxes would ensure that future development pays its fair share towards schools. Overall, impacts under Alternative A would be *less* than those of the proposed project.

### 5.4.2.16 TRANSPORTATION

As described in Chapter 4.16, Transportation, of this Draft EIR, the proposed project would result in two significant and unavoidable impacts related to transportation despite implementation of Mitigation Measures TRAN-1a TRAN-1b. These significant and unavoidable impacts are related to the inability of the proposed project to achieve the VMT reduction by 2040 of 15 percent below the baseline (2019) regional average. While the proposed General Plan 2040 results in a reduction in VMT Per Service Population by 2040, the VMT threshold of 15 percent below the current regional average would not be met.

As discussed in Chapter 4.16, Transportation, of this Draft EIR, the proposed project would result in a significant VMT impact for Total VMT and Work VMT and would not result in a significant Home VMT impact. The proposed project would focus potential future development in existing urban areas, half of which would occur specifically in the Downtown Precise Plan Area, which is located in a TPA and is therefore served by public transportation. As such, the VMT generated by potential future development would be lower than if development were proposed in areas not served by public transportation. The proposed project also includes goals, policies, and programs that expand upon General Plan 2020 and to ensure the transportation system in the EIR Study Area is multi-modal and designed to increase bicycle and pedestrian access and safety. Impacts related to hazards from design features, emergency access, and conflicting with adopted plans or decrease performance standards, were found to be less than significant.



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Alternative A would be implemented under the existing General Plan 2020, which does not include the proposed Downtown Precise Plan, which would concentrate roughly half of the development in the EIR Study Area through 2040 in a TPA in the Downtown Precise Plan Area. While the General Plan 2020 focuses on development in urbanized portions of the EIR Study Area, it does not concentrate development in the Downtown Precise Plan Area, and therefore VMT as a result of implementation of Alternative A would be higher than under the proposed project. As demonstrated in Chapter 4.16, Transportation, the Total VMT Per Service Population and Work VMT Per Employee would be greater under Alternative A than the proposed project (29.5 Total VMT Per Capita compared to 28.1 Total VMT Per Capita and 17.5 Work VMT Per Employee compared to 16.9 Work VMT Per Employee). Therefore, Alternative A would result *greater* VMT impacts when compared to the proposed project.

Impacts to bicycles and pedestrians would be *greater* under Alternative A when compared to the proposed project since the proposed project's improvements to bicycle and pedestrian facilities, particularly in the Downtown Precise Plan Area, would not be implemented.

Alternative A would not include the multi-modal circulation improvements that are included in the proposed project and the less intense development would result in higher VMT per capita. Overall, transportation impacts in the EIR Study Area under Alternative A would be *greater* when compared to the proposed project.

### 5.4.2.17 UTILITIES AND SERVICE SYSTEMS

As described in Chapter 4.17, Utilities and Service Systems, of this Draft EIR, impacts to sanitary wastewater, solid waste and stormwater infrastructure, and solid waste, under the proposed project, were found to be less than significant with the compliance of all applicable regulations. No mitigation measures are required.

Demand and consumption trends generally demonstrate that advances in recycling and solid waste reduction requirements, water-efficient regulations in building and landscaping, and stricter stormwater retention requirements, would reduce impact from existing conditions. However, it is assumed that because Alternative A would result in less overall development than the proposed project, less overall water demand, and less wastewater and solid waste generation, impacts under Alternative A would be *less* than those of the proposed project.

### 5.4.2.18 WILDFIRE

As described in Chapter 4.18, Wildfire, of this Draft EIR, the proposed project would not result in any significant impacts related to wildfire and no mitigation measures are required.

Chapter 4.18, Wildfire, of this Draft EIR determined that, due to compliance with applicable local, regional, and State regulations, the proposed project would not impair the implementation of an emergency response or emergency evacuation plan. Additionally, potential future development as a result of the proposed project would not be located in an area that would expose persons to wildfire or wildfire pollutants, nor would the project expose people or structures to significant risks, including downslope or

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downstream flooding or landslides. Finally, the proposed project would not result in the installation or maintenance of any infrastructure that could exacerbate fire risk or result in impacts to the environment.

Alternative A would continue implementation of the existing General Plan 2020, which focuses development in urbanized areas similar to the proposed project. The existing General Plan 2020 also does not include any infrastructure-related projects and would not conflict with an emergency response or emergency evacuation plan. Therefore, implementation of Alternative A would have *similar* impacts when compared to the proposed project.

### 5.4.3 RELATIONSHIP OF THE ALTERNATIVES TO THE OBJECTIVES

Under Alternative A, the proposed project would not be implemented and therefore, this alternative would not accomplish any of the project objectives.

## 5.5 ALTERNATIVE B: GREATER RESIDENTIAL GROWTH

### 5.5.1 DESCRIPTION

Table 5-4 shows the difference between the growth projections of the proposed project compared to Alternative B. As shown in Table 5-4, Alternative B would result in an increase in the number of households, housing units, and population while slightly reducing the number of jobs in the EIR Study Area when compared to the proposed project.

**TABLE 5-4 2020 TO 2040 GROWTH UNDER THE PROPOSED PROJECT AND ALTERNATIVE B**

Category	Proposed Project	Alternative B: Greater Residential Growth	Change between the Proposed Project and Alternative B
<b>Downtown Precise Plan Area</b>			
Households	2,100	2,550	450 more households
Residential Units	2,200	2,690	490 more residential units
Population	3,570	4,335	765 more residents
Jobs	2,020	2,000	20 fewer jobs
<b>Remainder of EIR Study Area</b>			
Households	2,150	3,280	1,130 more households
Residential Units	2,260	3,440	1,180 more residential units
Population	5,340	8,165	2,825 more residents
Jobs	2,095	1,915	180 fewer jobs
<b>Total EIR Study Area</b>			
Households	4,250	5,830	1,580 more households
Residential Units	4,460	6,130	1,670 more residential units
Population	8,910	12,500	3,590 more residents
Jobs	4,115	3,915	200 fewer jobs

Source: City of San Rafael, 2020.

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Because Alternative B would include more aggressive housing production, a potential loss of light industrial, office, and retail jobs is presumed. Alternative B includes all the 2015–2023 Housing Element sites, all of the residential sites evaluated in General Plan 2020, all of the potential housing and mixed-use sites identified in the Downtown Precise Plan, and residential development at various locations throughout the EIR Study Area. Alternative B presumes the same General Plan land use designations as the proposed project, except that two sites, one undeveloped and one industrial, would be re-designated as residential. Further, Alternative B would result in a high-density land use designation change on one site that is currently designated Hillside Resource Residential.

The alternatives analysis assumes that all applicable mitigation measures recommended for the proposed project and the proposed General Plan 2040 goals, policies, and programs would apply to Alternative B.

### 5.5.2 IMPACT DISCUSSION

The potential environmental impacts associated with Alternative B when compared to the proposed project are described herein.

#### 5.5.2.1 AESTHETICS

As described in Chapter 4.1, Aesthetics, of this Draft EIR, the proposed project would not result in any significant impacts related to aesthetics and no mitigation measures are required.

Alternative B does not propose changes that would result in substantial differences from the proposed growth potential of the proposed project. Like the proposed project, potential future development under Alternative B would still be anticipated to occur in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, where future development would have a lesser impact on scenic vistas. Under Alternative B, the proposed increases in maximum height in the Downtown Precise Plan Area would occur. As shown in Table 5-4, Alternative B would result in 490 additional residential units in the Downtown Precise Plan Area and 1,180 additional units in the remainder of the city, compared to the proposed project. This increase in development and height, regardless of the location of the development, would result in higher overall impacts to scenic vistas under Alternative B, therefore, impacts would be *greater* when compared to the proposed project.

Alternative B would, however, benefit from the updated and expanded goals, policies, and programs, as well as the proposed Downtown Precise Plan and the associated Downtown Code. Alternative B would be required to comply with best management practices and SRMC provisions that ensure new land uses do not generate excessive light levels and reduce light and glare spillover from future development to surrounding land uses. Therefore, impacts from light and glare under Alternative B would be *similar* when compared to the proposed project.

Overall, the addition of 1,670 new units in the EIR Study Area under this alternative that would be guided by the same regulations as the proposed project and would occur in the same development pattern, would result in *similar* aesthetics impacts when compared to the proposed project.

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### 5.5.2.2 AGRICULTURE AND FORESTRY RESOURCES

As determined in Chapter 4.2, Agriculture and Forestry Resources, the proposed project would result in less-than-significant impacts to agricultural resources and no impacts to forestry resources. The addition of 1,670 new units in the EIR Study Area under this alternative that would be guided by the same regulations and in the same development pattern as the proposed project, would result in *similar* impacts to agricultural and forestry resources when compared to the proposed project.

### 5.5.2.3 AIR QUALITY

As described in Chapter 4.3, Air Quality, of this Draft EIR, the proposed project would result in significant and unavoidable impacts during the operational phase even with implementation of Mitigation Measures AIR-2.2 and AIR-3.2. Implementation of Mitigation Measure AIR-2.1 3.1a, and AIR-3.1b, would reduce significant impact from construction to a less-than-significant level.

As described in Chapter 4.3, Air Quality, of this Draft EIR, implementation of the proposed project would not conflict with the 2017 *Clean Air Plan*, would pose no operational community risks or hazards, and would not generate any substantial odors. However, at a program level, implementation of the proposed project would result in significant and unavoidable impacts related to construction and operation of potential future development, as well as the cumulative contribution to the non-attainment designations of the San Francisco Bay Area Air Basin. These impacts were not determined based on the number of units, but due to the program-level nature of the project, which would be the same under each scenario. Nonetheless, the increased amount of construction from Alternative B would have *greater* air quality impacts from fugitive dust when compared to the proposed project.

Under Alternative B, increased development would occur; therefore, more direct and indirect criteria air pollutant emissions from energy (e.g., natural gas use), and area sources (e.g., aerosols and landscaping equipment) would occur. Similar to the proposed project, development that would occur under Alternative B would be infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development. Alternative B would benefit from the updated and expanded goals, policies, and programs in the proposed project aimed at reducing air pollutants and would concentrate development in existing urban areas and therefore Alternative B maintains the net benefit gained from siting future development near public transit and existing services. As described in the transportation discussion for this alternative (Section 5.5.2.16), the Total VMT Per Service Population and Work VMT Per Employee would be less under Alternative B than the proposed project (27.3 Total VMT Per Capita compared to 28.1 Total VMT Per Capita and 16.1 Work VMT Per Employee compared to 16.9 Work VMT Per Employee). The addition of housing does slightly increase the Home VMT Per Resident when compared to the proposed project (11.9 Home VMT Per Resident compared to 11.3 Home VMT Per Resident), but the reduction in Total VMT Per Capita would still reduce emissions when compared to the proposed project. Therefore, as a result of increasing housing and concentrating redevelopment in existing urban areas, Alternative B would reduce VMT, which are the major source of criteria air pollutants from the proposed project.

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Overall, while Alternative B would result in more residential development than the proposed project, air quality impacts from the operation of these uses would be considered *less* when compared to the proposed project.

### 5.5.2.4 BIOLOGICAL RESOURCES

As discussed in Chapter 4.4, Biological Resources, of this Draft EIR, the impacts to biological resources from the proposed project are fully mitigable with implementation of Mitigation Measures BIO-1 through BIO-4. Alternative B does not propose any changes that would result in substantial differences from the proposed growth potential of the proposed project. The 490 additional residential units in the Downtown Precise Plan Area and the 1,180 additional units in the remainder of the city would still be anticipated to occur in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, where future development would have a lesser impact on biological resources. Under Alternative B, Mitigation Measure BIO-1, which requires project-specific baseline biological resources assessments for projects on sites that contain natural habitat with features that could support special-status species and other sensitive biological resources, as well as active nests of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code, and Mitigation Measure BIO-4b, which would set standards certain development with the greater likelihood of causing bird collisions would be implemented. Therefore, while development would be more intensive under Alternative B, development would be concentrated in the same urban areas, and additional measures to protect biological resources would be realized, thus potential future development under Alternative B would result in *similar* impacts when compared to the proposed project.

### 5.5.2.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

As described in Chapter 4.5, Cultural and Tribal Cultural Resources, of this Draft EIR, the proposed project would result in less-than-significant impacts to cultural and tribal cultural resources with implementation of Mitigation Measures CULT-2 through CULT-4 and would result in a significant and unavoidable impact with implementation of Mitigation Measure CULT-1.

Under Alternative B, new development would continue throughout the city under existing plans and regulations, and would be guided by the Downtown Precise Plan and Downtown Code, which would establish new standards in the Downtown Precise Plan Area to further protect historic buildings. As explained in Chapter 4.5, there are existing prehistoric, architectural, historical, or archaeological resources in the EIR Study Area that could all be impacted by new demolition, inappropriate modification, or inappropriate new construction under the proposed project or Alternative B. Like the proposed project, Alternative B would be subject to the procedures of conduct following the discovery of human remains set forth in California Health and Safety Code, Public Resources Code and the California Code of Regulations. Alternative B would also include all mitigating policies and programs that the proposed project includes to further ensure the protection of historic resources, particularly in the Downtown Precise Plan Area. However, because more development would occur under the Alternative B scenario, the potential to impact these resources would be *greater* when compared to the proposed project. Overall, Alternative B would have a *greater* impact to cultural resources when compared to the proposed project.

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### 5.5.2.6 ENERGY

As described in Chapter 4.6, Energy, of this Draft EIR, the proposed project would not result in any significant impacts related to energy and no mitigation measures are required.

All development that occurs in the State is required to comply with best management practices regulated in the 2019 California Green Building Code and 2019 Building and Energy Efficiency Standards, which would be subject to the triennial updates that would presumably improve over time. Compliance with these regulations ensure new development would not result in the wasteful or inefficient use of energy. Further, new development would automatically be enrolled in renewable energy supplied by Marin Clean Energy. Such requirements and enrollment in MCE would be required under both the proposed project and under Alternative B. Additionally, neither the proposed project nor Alternative B would introduce a level of development and population growth that would be anticipated to necessitate the construction of new energy supply facilities or transmission infrastructure.

More development would occur under the Alternative B scenario, so energy consumption from construction would be *greater* when compared to the proposed project. However, newer buildings would be more energy efficient, thus energy impacts from older buildings would be less efficient when compared to the proposed project. This assumes that the increased development potential for the additional housing would possibly involve demolition of older, less energy-efficient buildings than under the proposed project. Ultimately, as described in the air quality discussion and transportation section, energy use from VMT would be less under Alternative B because more infill development in PDAs and TPAs would occur when compared to the proposed project. Therefore, overall energy efficiency would be *similar* under Alternative B when compared to the proposed project.

### 5.5.2.7 GEOLOGY AND SOILS

As described in Chapter 4.7, Geology and Soils, of this Draft EIR, the proposed project would have less-than-significant impacts related to geology and soils in the EIR Study Area. The impacts related to unknown unique paleontological resources are fully mitigable with implementation of Mitigation Measure GEO-6.

Future development under both Alternative B and the proposed project would occur in the same urban areas and would be subject to the same federal, State, and local regulations that address and prevent hazards associated with geology, soils, and seismicity. Although Alternative B would result in less overall development, compliance with existing regulations related to geologic and seismic safety would apply similarly to both future development under Alternative B and the proposed project; therefore, Alternative B would result in *similar* impacts when compared to the proposed project.

### 5.5.2.8 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.8, Greenhouse Gas Emissions, of this Draft EIR, the proposed project would result in significant and unavoidable impacts despite implementation of Mitigation Measures GHG-1.

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Implementation of the proposed project would result in significant and unavoidable GHG emissions impacts when applying program-level thresholds for the forecast year 2040. With respect to GHG emissions from construction, new buildings constructed would be subject to the triennial updates to California's Building and Energy Efficiency Standards, which would presumably improve over time. While new buildings would be more energy efficient, there would be an overall increase in energy usage under the Alternative B from construction due to the amount of proposed growth. Even with implementation of the 2017 Scoping Plan, the 2050 target identified under Executive Order S-03-05, is estimated to not be achievable without major advances in technology. The identification of these program-level impacts does not preclude the finding of less-than-significant impacts for subsequent projects that comply with BAAQMD screening criteria or meet applicable thresholds of significance.

Development that could occur under Alternative B would occur similar to the proposed project in the Downtown Precise Plan and other urban portions of the EIR Study Area. Alternative B would result in a higher concentration of development in these areas, which would result in the same net benefit gained from siting more intense infill near public transit and result in a higher percentage of transit users that may rely on automobiles (as opposed to walking or biking). Therefore, as a result of placing development in these urban areas, Alternative B would result in less VMT (27.3 Total VMT Per Capita compared to 28.1 Total VMT Per Capita and 16.1 Work VMT Per Employee compared to 16.9 Work VMT Per Employee), which are the major source of criteria GHG emissions from the proposed project. Therefore, while Alternative B would result in the same type of urban development with additional housing, GHG emissions impacts from operation would be considered *less* when compared to the proposed project due to the higher concentration of development.

Under Alternative B, future development in the EIR Study Area would continue to occur under the proposed General Plan 2040 and would result in infill development in PDAs and TPAs near transit as approximately half of the proposed project's development would. Accordingly, impacts related to consistency with the 2017 Scoping Plan, *Plan Bay Area*, and the City's *Climate Change Action Plan* as integrated into the General Plan, would be *similar* under both scenarios.

Overall, because Alternative B would result in more infill development and less VMT, impacts from GHG emissions under Alternative B would be *less* when compared to the proposed project.

### 5.5.2.9 HAZARDS AND HAZARDOUS MATERIALS

As described in Chapter 4.9, Hazards and Hazardous Materials, of this Draft EIR, the proposed project would result in less-than-significant impacts related to hazards and hazardous materials with implementation of Mitigation Measure HAZ-4.

As discussed in Chapter 4.9, Hazards and Hazardous Materials, of this Draft EIR, there are sites within the EIR Study Area and the Downtown Precise Plan Area that are included on a list of hazardous materials sites. Impact Discussion HAZ-4 of this Draft EIR concluded that implementation of the proposed project could result in construction and operation activities on sites with known hazardous materials and, as a result, create a significant hazard to the public or the environment. However, such impacts were deemed less-than-significant with the adoption of mitigation measures. Implementation of Alternative B would occur in approximately the same locations as the proposed project, but would result in a higher intensity

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of development. Alternative B would comply with the same federal and State regulations as the proposed project and would still result in the adoption of the same goals, policies, and programs related to hazardous materials as the proposed project. Therefore, Alternative B would have a *similar* impact when compared to the proposed project.

The proposed project was found to have a less-than-significant impact related to the routine transport, use, or disposal of hazardous waste, the release of hazardous waste, or the emitting of hazardous emissions or handling of hazardous materials in the proximity of an existing or proposed school. As further discussed in Chapter 4.9, Hazards and Hazardous Materials, the EIR Study Area is not located within an airport land use plan area for which potential future development could conflict, and implementation of the proposed project would not conflict with an adopted emergency response plan or emergency evacuation plan. Potential future development that could occur in the EIR Study Area from implementation of the proposed project would be required to comply with all federal, State, and local regulations pertaining to hazards and hazardous materials, and the proposed project includes goals, policies, and programs which would further reduce impacts related to hazardous materials. Development that would occur under Alternative B would be required to comply with the same federal and State regulations and would be required to comply with the same goals, policies, and programs that reduce impacts related to hazardous materials. Therefore, Alternative B would have a *similar* impact when compared to the proposed project.

### **5.5.2.10 HYDROLOGY AND WATER QUALITY**

As described in Chapter 4.10, Hydrology and Water Quality, of this Draft EIR, the proposed project would not result in any significant impacts related to hydrology and water quality and no mitigation measures are required. Compliance with existing State and local regulations and procedures would ensure that pre- and post-construction impacts to water quality would be less than significant. These regulations and procedures would be maintained under Alternative B.

Although Alternative B would result in more development overall, future development would largely occur within previously urbanized areas similar to the proposed project and would connect to existing drainage systems already in place and be subject to the same existing federal, State, and local regulations relating to hydrology and water quality. Compliance with existing regulations would ensure that pre- and post-construction impacts to water quality be minimized as future development occurs. Overall, potential future development under Alternative B and the proposed project would be in the same urbanized environments and would be subject to the same existing regulations that address hydrology and water quality impacts. Future development under each scenario would benefit from the updated and expanded General Plan 2040 goals, policies, and programs related to hydrology and water quality and impacts would be considered *similar* when compared to the proposed project.

### **5.5.2.11 LAND USE AND PLANNING**

As described in Chapter 4.11, Land Use and Planning, of this Draft EIR, implementation of the proposed project would result in less-than-significant impacts related to land use and planning.



## ALTERNATIVES TO THE PROPOSED PROJECT

The proposed project would aim to improve connectivity and would not create physical barriers within existing communities. While implementation of Alternative B would result in higher intensity of development, the integration of such development would be *similar* to that of the proposed project and does not propose physical features that could divide a community. Accordingly, impacts would be *similar* under both scenarios.

Under Alternative B, development would occur throughout the EIR Study Area under the proposed General Plan 2040 and Zoning Code while development in the Downtown Precise Plan Area would occur under the Downtown Precise Plan and associated Downtown Code. Such development would be the same as under the proposed project and therefore implementation of either development scenario would not conflict with any applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be *similar* when compared to the proposed project.

### 5.5.2.12 MINERAL RESOURCES

As discussed in Chapter 4.12, Mineral Resources, of this Draft EIR, the San Rafael Rock Quarry and McNear Brickworks are the only designated mineral resource sites with local, regional, or State significance within the EIR Study Area. The site is located outside of the San Rafael city limits, but within the EIR Study Area. The proposed project was found to have a less-than-significant impact on the San Rafael Rock Quarry and McNear Brickworks because potential future development under the proposed project would occur in existing urbanized areas not located near the mineral resource site. Future development under Alternative B would occur in the locations discussed in the existing General Plan 2020, which include already urbanized portions of the EIR Study Area that would not result in an impact to the mineral resource site. Therefore, impacts to mineral resources would be *similar* to the proposed project under Alternative B.

### 5.5.2.13 NOISE AND VIBRATION

As described in Chapter 4.13, Noise and Vibration, of this Draft EIR, the proposed project would result in a less-than-significant impact with implementation of Mitigation Measures NOISE-1, NOISE-2a, and NOISE-2b.

Future development allowed under the proposed project would be subject to the standards of the SRMC as well as goals, policies, and programs proposed in General Plan 2040, including those relating to the interface between residential and non-residential land uses. As specific uses are proposed for particular sites, project-level design, permitting, and/or environmental review would serve to ensure that individual uses would comply with the noise regulations. Future development under Alternative B would also be subject to these applicable standards. Impacts would be *similar* under both scenarios in this regard.

Alternative B would result in higher-intensity development, which would result in more construction but less VMT. Because construction is temporary, the reduced noise from the operational phase, would result in *less* noise impacts under Alternative B when compared to the proposed project.

## ALTERNATIVES TO THE PROPOSED PROJECT

### 5.5.2.14 POPULATION AND HOUSING

As described in Chapter 4.14, Population and Housing, of this Draft EIR, the proposed project would not result in any significant impacts related to population and housing, and no mitigation measures are required.

As described in Chapter 4.14, Population and Housing, of this Draft EIR, implementation of the proposed project would slightly exceed current regional projections. However, implementation of the proposed project was found to have a less-than-significant impact due to the focus on infill development in PDAs and TPAs, which is in alignment with the regional planning framework of *Plan Bay Area*. Further, the proposed project is the overriding policy document in the EIR Study Area which plans for population growth that is reasonably foreseeable through 2040.

Alternative B would result in more population and housing than the proposed project; thus, the regional projections would be exceeded more than the proposed project under this scenario, but would still be in alignment with the regional planning framework of *Plan Bay Area*. Alternative B would include the updated policy framework of the proposed project, which ensures adequate planning occurs to accommodate the future population increase and future development. Therefore, impacts under Alternative B would be *similar* to those under the proposed project.

Alternative B would allow for a higher net increase of residential and non-residential development in the EIR Study Area through 2040. Alternative B would result in more housing than the proposed project and therefore it would not require replacement housing outside the EIR Study Area. Therefore, impacts under Alternative B would be *similar* to those of the proposed project.

In summary, while Alternative B would result in a different growth potential, impacts related to population and housing would be *similar* when compared to the proposed project.

### 5.5.2.15 PUBLIC SERVICES AND RECREATION

As described in Chapter 4.15, Public Services and Recreation, of this Draft EIR, impacts under the proposed project to fire protection services, police services, parks, schools, and libraries, were found to be less than significant. No mitigation measures are required.

Alternative B would result in more new residents in the EIR Study Area than the proposed project, and therefore, would result in more demand on the public service providers that serve the EIR Study Area. Potential future development under Alternative B would be required to comply with all existing and proposed new City regulations adopted to ensure that development pays its fair share of the cost of delivering services, providing park space, and libraries. As discussed in Chapter 4.15, the City has recently upgraded critical public service facilities and exceeds the existing parkland standard in General Plan 2020. However, because Alternative B would increase overall development which would result in an increase in demand. Therefore, impacts under Alternative B would be *greater* when compared to the proposed project.

## ALTERNATIVES TO THE PROPOSED PROJECT

### 5.5.2.16 TRANSPORTATION

As described in Chapter 4.16, Transportation, of this Draft EIR, the proposed project would result in two significant and unavoidable impacts related to transportation despite implementation of Mitigation Measures TRAN-1a and TRAN-1b. These significant and unavoidable impacts are related to the inability of the proposed project to achieve the VMT reduction by 2040 of 15 percent below the baseline (2019) regional average. While the proposed General Plan 2040 results in a reduction in VMT Per Service Population by 2040, the VMT threshold of 15 percent below the current regional average would not be met.

As discussed in Chapter 4.16, Transportation, of this Draft EIR, the proposed project would result in a significant VMT impact for Total VMT and Work VMT and would not result in a significant Home VMT impact. Both scenarios would result in similar development patterns, but Alternative B would yield more residential units. Therefore, the Total VMT Per Service Population and Work VMT Per Employee would be *less* under Alternative B than the proposed project (27.3 Total VMT Per Capita compared to 28.1 Total VMT Per Capita and 16.1 Work VMT Per Employee compared to 16.9 Work VMT Per Employee).

Both Alternative B and the proposed project would include the improvements recognized in the Downtown Precise Plan and updated goals, policies, and programs that expand upon General Plan 2020 and to ensure the transportation system in the EIR Study Area is multi-modal and designed to increase bicycle and pedestrian access and safety. Impacts related to hazards from design features, emergency access, and conflicting with adopted plans or decrease performance standards, were found to be less than significant.

Overall, transportation impacts in the EIR Study Area under Alternative B would be *less* when compared to the proposed project.

### 5.5.2.17 UTILITIES AND SERVICE SYSTEMS

As described in Chapter 4.17, Utilities and Service Systems, of this Draft EIR, impacts to sanitary wastewater, solid waste and stormwater infrastructure, and solid waste, under the proposed project, were found to be less than significant with the compliance of all applicable regulations. No mitigation measures are required.

Since Alternative B would result in greater development, and thus, more water demand, wastewater, and solid waste generation, impacts under the Alternative B would be *greater* when compared to the proposed project.

### 5.5.2.18 WILDFIRE

Chapter 4.18, Wildfire, of this Draft EIR determined that, due to compliance with applicable local, regional, and State regulations, the proposed project would not impair the implementation of an emergency response or emergency evacuation plan. Additionally, potential future development as a result of the proposed project would not be located in an area that would expose persons to wildfire or wildfire pollutants, nor would the project expose people or structures to significant risks, including downslope or

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downstream flooding or landslides. Finally, the proposed project would not result in the installation or maintenance of any infrastructure that could exacerbate fire risk or result in impacts to the environment.

Alternative B would result in higher-density development that would be located in the same locations as in the proposed project; would adopt the same goals, policies, and programs to reduce the risk of wildfire; and would not include the installation or maintenance of any infrastructure projects. Therefore, implementation of Alternative B would have *similar* impacts to the proposed project.

### 5.5.3 RELATIONSHIP OF THE ALTERNATIVES TO THE OBJECTIVES

As listed in Section 5.2, the primary purposes of the proposed project are to plan for the growth and conservation of San Rafael over a 20-year time horizon and to achieve a more equitable, sustainable, and prosperous future for all residents. This requires extending the buildout horizon to year 2040 and updating goals, policies, and programs so that they meet current State requirements and community priorities. As part of this process, the City drafted 2040 Guiding Principles, which build upon the framework of the vision, guiding principles, and goals of the current General Plan 2020 and reflect the community’s desires for San Rafael’s future. Big-picture objectives related specifically to growth include focusing growth in the Downtown Precise Plan Area, capitalizing on transit opportunities in and around PDAs, and streamlining future development that is consistent with the proposed project.

Alternative B would result in more housing and population growth in the EIR Study Area when compared to the proposed project. However, such growth would generally occur in the same locations as included in the proposed project, which were chosen based on their appropriateness in fulfilling the City’s goals of focusing infill development in existing urban areas near public transportation. Therefore, Alternative B would meet the project objectives.

## 5.6 ALTERNATIVE C: LOWER RESIDENTIAL GROWTH

### 5.6.1 DESCRIPTION

Table 5-5 shows the difference between the 2020 to 2040 growth projections of the proposed project compared to Alternative C. As shown in Table 5-5, Alternative C would reduce the number of households, housing units, and population while slightly increasing the number of jobs in the EIR Study Area when compared to the proposed project.

TABLE 5-5 2020 TO 2040 GROWTH UNDER THE PROPOSED PROJECT AND ALTERNATIVE C

Category	Proposed Project	Alternative C: Lower Residential Growth	Change between the Proposed Project and Alternative C
<b>Downtown Precise Plan Area</b>			
Households	2,100	1,535	565 fewer households
Residential Units	2,200	1,615	585 fewer residential units
Population	3,570	2,610	960 fewer residents
Jobs	2,020	2,050	30 more jobs
<b>Remainder of EIR Study Area</b>			

## ALTERNATIVES TO THE PROPOSED PROJECT

Households	2,150	1,325	865 fewer households
Residential Units	2,260	1,390	870 fewer residential units
Population	5,340	3,215	2,125 fewer residents
Jobs	2,095	2,190	95 more jobs
<b>Total EIR Study Area</b>			
Households	<b>4,250</b>	<b>2,860</b>	<b>1,390 fewer households</b>
Residential Units	<b>4,460</b>	<b>3,005</b>	<b>1,455 fewer residential units</b>
Population	<b>8,910</b>	<b>5,825</b>	<b>3,085 fewer residents</b>
Jobs	<b>4,115</b>	<b>4,240</b>	<b>125 more jobs</b>

Source: City of San Rafael, 2020.

Alternative C presumes the same General Plan land use designations as the proposed project and differs only in the presumed rate of growth. Alternative C excludes several 2015–2023 Housing Element sites and Downtown Precise Plan sites included in the proposed project. This alternative would convert less commercial acreage to housing, which results in a slightly higher total of jobs anticipated by 2040.

The alternatives analysis assumes that all applicable mitigation measures recommended for the proposed project and the proposed General Plan 2040 goals, policies, and programs would apply to Alternative C.

### 5.6.2 IMPACT DISCUSSION

The potential environmental impacts associated with Alternative C when compared to the proposed project are described herein.

#### 5.6.2.1 AESTHETICS

As described in Chapter 4.1, Aesthetics, of this Draft EIR, the proposed project would not result in any significant impacts related to aesthetics and no mitigation measures are required.

Alternative C does not propose any changes that would result in substantial differences from the proposed growth potential of the proposed project. Potential future development would still be anticipated to occur in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, where future development would have a lesser impact on scenic vistas. Under Alternative C, the proposed increases in maximum height in the Downtown Precise Plan Area would still occur. However, Alternative C would result in 585 fewer residential units in the Downtown Precise Plan Area and the 870 fewer units in the remainder of the city, compared to the proposed project, and therefore, overall impacts to scenic vistas under Alternative C would be *less* when compared to the proposed project.

Alternative C would benefit from the updated and expanded goals, policies, and programs, as well as the proposed Downtown Precise Plan and the associated Downtown Code. Alternative C would be required to comply with best management practices and SRMC provisions that ensure new land uses do not generate excessive light levels and reduce light and glare spillover from future development to surrounding land uses. Therefore, impacts from light and glare under Alternative C would be *similar* when compared to the proposed project.

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Overall, the reduction of 1,390 new units and addition of 125 more jobs in the EIR Study Area under this alternative that would be guided by the same regulations as the proposed project and would occur in the same development pattern, and would result in *less* aesthetics impacts when compared to the proposed project.

### 5.6.2.2 AGRICULTURE AND FORESTRY RESOURCES

As determined in Chapter 4.2, Agriculture and Forestry Resources, the proposed project would result in less-than-significant impacts to agricultural resources and no impacts to forestry resources. The reduction of 1,390 new units and addition of 125 more jobs in the EIR Study Area under this alternative that would be guided by the same regulations and in the same development pattern as the proposed project, would result in *similar* impacts to agricultural and forestry resources when compared to the proposed project.

### 5.6.2.3 AIR QUALITY

As described in Chapter 4.3, Air Quality, of this Draft EIR, the proposed project would result in significant and unavoidable impacts during the operational phase even with implementation of Mitigation Measures AIR-2.2 and AIR-3.2. Implementation of Mitigation Measure AIR-2.1 3.1a, and AIR-3.1b, would reduce significant impact from construction to a less-than-significant level.

As described in Chapter 4.3, Air Quality, of this Draft EIR, implementation of the proposed project would not conflict with the 2017 *Clean Air Plan*, would pose no operational community risks or hazards, and would not generate any substantial odors. However, at a program level, implementation of the proposed project would result in significant and unavoidable impacts related to construction and operation of potential future development, as well as the cumulative contribution to the non-attainment designations of the San Francisco Bay Area Air Basin. The increased amount of construction from Alternative C would have *greater* air quality impacts from fugitive dust when compared to the proposed project.

Under Alternative C, less development would occur; therefore, less direct and indirect criteria air pollutant emissions from energy (e.g., natural gas use), and area sources (e.g., aerosols and landscaping equipment) would occur. Similar to the proposed project, development that would occur under Alternative C would be infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development. Alternative C would benefit from the updated and expanded goals, policies, and programs in the proposed project aimed at reducing air pollutants and would concentrate development in existing urban areas and therefore Alternative C maintains the net benefit gained from siting future development near public transit and existing services. As described in the transportation discussion for this alternative (Section 5.6.2.16), the Total VMT Per Service Population and Work VMT Per Employee would be *slightly greater* under Alternative C than the proposed project (28.3 Total VMT Per Capita compared to 28.1 Total VMT Per Capita and 17.3 Work VMT Per Employee compared to 16.9 Work VMT Per Employee). The reduction of 1,390 new units and addition of 125 more jobs does slightly decrease the Home VMT Per Resident when compared to the proposed project (11.2 Home VMT Per Resident compared to 11.3 Home VMT Per Resident). Therefore, this combination of reduced housing and increased jobs in Alternative C would result in increased but similar VMT, which are the major source of criteria air pollutants from the proposed project.

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Overall, while Alternative C would result in less housing and more employment than the proposed project, air quality impacts from the operation of these uses would be considered *greater* due to increased VMT when compared to the proposed project.

### 5.6.2.4 BIOLOGICAL RESOURCES

As discussed in Chapter 4.4, Biological Resources, of this Draft EIR, the impacts to biological resources from the proposed project are fully mitigable with implementation of Mitigation Measures BIO-1 through BIO-4. Alternative C does not propose any changes that would result in substantial differences from the proposed growth potential of the proposed project. The 585 fewer residential units and 30 more jobs in the Downtown Precise Plan Area and the 870 fewer units and 95 more jobs in the remainder of the city would still be anticipated to occur in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, where future development would have a lesser impact on biological resources. Under Alternative C, Mitigation Measure BIO-1, which requires project-specific baseline biological resources assessments for projects on sites that contain natural habitat with features that could support special-status species and other sensitive biological resources, as well as active nests of birds protected under the Migratory Bird Treaty Act and California Fish and Game Code, and Mitigation Measure BIO-4b, which would set standards certain development with the greater likelihood of causing bird collisions would be implemented. Therefore, while development would be more intensive under Alternative C, development would be concentrated in the same urban areas, and additional measures to protect biological resources would be realized, thus potential future development under Alternative C would result in *similar* impacts when compared to the proposed project.

### 5.6.2.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

As described in Chapter 4.5, Cultural and Tribal Cultural Resources, of this Draft EIR, the proposed project would result in less-than-significant impacts to cultural and tribal cultural resources with implementation of Mitigation Measures CULT-2 through CULT-4 and would result in a significant and unavoidable impact with implementation of Mitigation Measure CULT-1.

Under Alternative C, new development would continue throughout the city under existing plans and regulations, and would be guided by the Downtown Precise Plan and Downtown Code, which would establish new standards in the Downtown Precise Plan Area to further protect historic buildings. As explained in Chapter 4.5, there are existing prehistoric, architectural, historical, or archaeological resources in the EIR Study Area that could all be impacted by new demolition, inappropriate modification, or inappropriate new construction under the proposed project or Alternative C. Like the proposed project, Alternative C would be subject to the procedures of conduct following the discovery of human remains set forth in California Health and Safety Code, Public Resources Code and the California Code of Regulations. Alternative C would also include all mitigating policies and programs that the proposed project includes to further ensure the protection of historic resources, particularly in the Downtown Precise Plan Area. However, because less development would occur under the Alternative C scenario, the potential to impact these resources would be *less* when compared to the proposed project. Overall, Alternative C would have *fewer* impacts to cultural resources when compared to the proposed project.

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### 5.6.2.6 ENERGY

As described in Chapter 4.6, Energy, of this Draft EIR, the proposed project would not result in any significant impacts related to energy and no mitigation measures are required.

All development that occurs in the State is required to comply with best management practices regulated in the 2019 California Green Building Code and 2019 Building and Energy Efficiency Standards, which would be subject to the triennial updates that would presumably improve over time. Compliance with these regulations ensure new development would not result in the wasteful or inefficient use of energy. Further, new development would automatically be enrolled in renewable energy supplied by Marin Clean Energy. Such requirements and enrollment in MCE would be required under both the proposed project and under Alternative C. Additionally, neither the proposed project nor Alternative C would introduce a level of development and population growth that would be anticipated to necessitate the construction of new energy supply facilities or transmission infrastructure.

Less development would occur under the Alternative C scenario, so energy consumption from construction would be *less* when compared to the proposed project. However, newer buildings would be more energy efficient, thus energy impacts from older buildings would be less energy efficient when compared to the proposed project. This assumes that the increased development potential for the additional housing and jobs under the proposed project would possibly involve the demolition of older, less energy-efficient buildings than the proposed project. Ultimately, as described in the air quality discussion and transportation section for this alternative, energy use from VMT would be increased and therefore, while Alternative C would result in less housing and more employment than the proposed project, energy impacts would be considered *greater* due to increased VMT when compared to the proposed project.

### 5.6.2.7 GEOLOGY AND SOILS

As described in Chapter 4.7, Geology and Soils, of this Draft EIR, the proposed project would have less-than-significant impacts related to geology and soils in the EIR Study Area. The impacts related to unknown unique paleontological resources are fully mitigable with implementation of Mitigation Measure GEO-6.

Future development under both Alternative C and the proposed project would occur in the same urban areas and would be subject to the same federal, State, and local regulations that address and prevent hazards associated with geology, soils, and seismicity. Although Alternative C would result in *less* overall development, compliance with existing regulations related to geologic and seismic safety would apply similarly to both future development under Alternative C and the proposed project; therefore, Alternative C would result in *similar* impacts when compared to the proposed project.

### 5.6.2.8 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.8, Greenhouse Gas Emissions, of this Draft EIR, the proposed project would result in two significant and unavoidable impacts despite implementation of Mitigation Measures GHG-1.



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Implementation of the proposed project would result in significant and unavoidable GHG emissions impacts when applying program-level thresholds for the forecast year 2040. With respect to GHG emissions from construction, new buildings constructed would be subject to the triennial updates to California’s Building and Energy Efficiency Standards, which would presumably improve over time. New buildings would be more energy efficient and there would be an overall decrease in energy usage under the Alternative C from construction due to the reductions of proposed growth. Even with implementation of the 2017 Scoping Plan, the 2050 target identified under Executive Order S-03-05, is estimated to not be achievable without major advances in technology. The identification of these program-level impacts does not preclude the finding of less-than-significant impacts for subsequent projects that comply with BAAQMD screening criteria or meet applicable thresholds of significance.

Development that could occur under Alternative C would occur similar to the proposed project in the Downtown Precise Plan and other urban portions of the EIR Study Area. Alternative C would result in a higher concentration of development in these areas, which would result in the same net benefit gained from siting more intense infill near public transit and result in a higher percentage of transit users that may rely on automobiles (as opposed to walking or biking). Therefore, as a result of placing development in these urban areas, Alternative C would result in slightly increased VMT (28.3 Total VMT Per Capita compared to 28.1 Total VMT Per Capita and 16.1 Work VMT Per Employee compared to 17.3 Work VMT Per Employee), which are the major source of criteria GHG emissions from the proposed project. While the Work VMT Per Employee is greater than the proposed project, the Total VMT Per Capita is essentially the same. Therefore, while Alternative C would result in the same type of urban development with fewer housing and more jobs, GHG emissions impacts from operation would be considered *similar* when compared to the proposed project due to the higher concentration of development.

Under Alternative C, future development in the EIR Study Area would continue to occur under the proposed General Plan 2040 and would result in infill development in PDAs and TPAs near transit as approximately half of the proposed project’s development would. Accordingly, impacts related to consistency with the 2017 Scoping Plan, *Plan Bay Area*, and the City’s *Climate Change Action Plan* as integrated into the General Plan, would be *similar* under both scenarios.

Overall, because Alternative C would result in less infill development but slightly greater VMT, impacts from GHG emissions under Alternative C would be *greater* when compared to the proposed project.

### 5.6.2.9 HAZARDS AND HAZARDOUS MATERIALS

As described in Chapter 4.9, Hazards and Hazardous Materials, of this Draft EIR, the proposed project would result in less-than-significant impacts related to hazards and hazardous materials with implementation of Mitigation Measure HAZ-4.

As discussed in Chapter 4.9, Hazards and Hazardous Materials, of this Draft EIR, there are sites within the EIR Study Area and the Downtown Precise Plan Area that are included on a State recognized list of hazardous materials sites. Impact Discussion HAZ-4 of this Draft EIR concluded that implementation of the proposed project could result in construction and operation activities on sites with known hazardous materials and, as a result, create a significant hazard to the public or the environment. However, such impacts were deemed less-than-significant with the adoption of mitigation measures. Implementation of

## ALTERNATIVES TO THE PROPOSED PROJECT

Alternative C would occur in approximately the same locations as the proposed project but would result in a different mix of development (less residential and more jobs). Therefore, development under Alternative C would have a *similar* probability of being located on active hazardous materials sites. Alternative C would comply with the same federal and State regulations as the proposed project and would still result in the adoption of the same goals, policies, and programs related to hazardous materials as the proposed project. Therefore, Alternative C would have a *similar* impact when compared to the proposed project.

The proposed project was found to have a less-than-significant impact related to the routine transport, use, or disposal of hazardous waste, the release of hazardous waste, or the emitting of hazardous emissions or handling of hazardous materials in the proximity of an existing or proposed school. As further discussed in Chapter 4.9, Hazards and Hazardous Materials, the EIR Study Area is not located within an airport land use plan area for which potential future development could conflict, and implementation of the proposed project would not conflict with an adopted emergency response plan or emergency evacuation plan. Potential future development which could occur in the EIR Study Area from implementation of the proposed project would be required to comply with all federal, State, and local regulations pertaining to hazards and hazardous materials, and the proposed project includes goals, policies, and programs which would further reduce impacts related to hazardous materials. Development that would occur under Alternative C would be required to comply with the same federal and State regulations, and would be required to comply with the updated and expanded General Plan 2040 goals, policies, and programs that reduce impacts related to hazardous materials. Therefore, Alternative C would have a *similar* impact when compared to the proposed project.

### 5.6.2.10 HYDROLOGY AND WATER QUALITY

As described in Chapter 4.10, Hydrology and Water Quality, of this Draft EIR, the proposed project would not result in any significant impacts related to hydrology and water quality and no mitigation measures are required. Compliance with existing State and local regulations and procedures would ensure that pre- and post-construction impacts to water quality would be less than significant. These regulations and procedures would be maintained under Alternative C.

Alternative C would result in less development overall and future development would occur within the same previously urbanized areas as the proposed project that would connect to existing drainage systems already in place and be subject to the same existing federal, State, and local regulations relating to hydrology and water quality. Compliance with existing regulations would ensure that pre- and post-construction impacts to water quality be minimized as future development occurs. Overall, potential future development under Alternative C and the proposed project would be in the same urbanized environments and would be subject to the same existing regulations that address hydrology and water quality impacts. Future development under each scenario would benefit from the updated and expanded General Plan 2040 goals, policies, and programs related to hydrology and water quality and impacts would be considered *similar* when compared to the proposed project.

### 5.6.2.11 LAND USE AND PLANNING

As described in Chapter 4.11, Land Use and Planning, of this Draft EIR, implementation of the proposed project would result in less-than-significant impacts related to land use and planning.

## ALTERNATIVES TO THE PROPOSED PROJECT

The proposed project would aim to improve connectivity and would not create physical barriers within existing communities. While implementation of Alternative C would result in a lower intensity of development, the integration of such development would be *similar* to that of the proposed project and does not propose physical features that could divide a community. Accordingly, impacts would be *similar* under both scenarios.

Under Alternative C, development would occur throughout the EIR Study Area under the proposed General Plan 2040 and Zoning Code while development in the Downtown Precise Plan Area would occur under the Downtown Precise Plan and associated Downtown Code. Such development would be the same as under the proposed project and therefore implementation of either development scenario would not conflict with any applicable land use plan adopted for the purpose of avoiding or mitigating an environmental effect and impacts would be *similar* when compared to the proposed project.

### 5.6.2.12 MINERAL RESOURCES

As discussed in Chapter 4.12, Mineral Resources, of this Draft EIR, the San Rafael Rock Quarry and McNear Brickworks are the only designated mineral resource sites with local, regional, or State significance within the EIR Study Area. The site is located outside of the San Rafael city limits, but within the EIR Study Area. The proposed project was found to have a less-than-significant impact on the San Rafael Rock Quarry and McNear Brickworks because potential future development under the proposed project would occur in existing urbanized areas not located near the mineral resource site. Future development under Alternative C would occur in the locations discussed in the existing General Plan 2020, which include already urbanized portions of the EIR Study Area that would not result in an impact to the mineral resource site. Therefore, impacts to mineral resources would be *similar* to the proposed project under Alternative C.

### 5.6.2.13 NOISE AND VIBRATION

As described in Chapter 4.13, Noise and Vibration, of this Draft EIR, the proposed project would result in a less-than-significant impact with implementation of Mitigation Measures NOISE-1, NOISE-2a, and NOISE-2b.

Future development allowed under the proposed project would be subject to the standards of the SRMC as well as goals, policies, and programs proposed in General Plan 2040, including those relating to the interface between residential and non-residential land uses. As specific uses are proposed for particular sites, project-level design, permitting, and/or environmental review would serve to ensure that individual uses would comply with the noise regulations. Future development under Alternative C would also be subject to these applicable standards. Impacts would be *similar* under both scenarios in this regard.

Alternative C would result in less intense development, which would result in more construction and increased but *similar* VMT. Because construction is temporary, the slightly greater but *similar* noise from the operational phase would result in *similar* noise impacts under Alternative C when compared to the proposed project.

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### 5.6.2.14 POPULATION AND HOUSING

As described in Chapter 4.14, Population and Housing, of this Draft EIR, the proposed project would not result in any significant impacts related to population and housing, and no mitigation measures are required.

As described in Chapter 4.14, Population and Housing, of this Draft EIR, implementation of the proposed project would slightly exceed current regional projections. However, implementation of the proposed project was found to have a less-than-significant impact due to the focus on infill development in PDAs and TPAs, which is in alignment with the regional planning framework of *Plan Bay Area*. Further, the proposed project is the overriding policy document in the EIR Study Area which plans for population growth that is reasonably foreseeable through 2040.

Alternative C would result in less population and housing, and more jobs than the proposed project; thus, the regional projections would be closer to the 2040 regional forecasts for San Rafael under Plan Bay Area 2040. Alternative C would include the updated policy framework of the proposed project, which ensures adequate planning occurs to accommodate the future population increase and future development. Therefore, impacts under Alternative C would be *similar* to those under the proposed project.

Alternative C would allow for a lower increase of residential and higher non-residential development in the EIR Study Area through 2040. Alternative C would result in less housing than the proposed project but would still not require replacement housing outside the EIR Study Area. Therefore, impacts under Alternative C would be *similar* to those of the proposed project.

In summary, while Alternative C would result in a different growth potential, impacts related to population and housing would be *similar* when compared to the proposed project.

### 5.6.2.15 PUBLIC SERVICES AND RECREATION

As described in Chapter 4.15, Public Services and Recreation, of this Draft EIR, impacts under the proposed project to fire protection services, police services, parks, schools, and libraries, were found to be less than significant. No mitigation measures are required.

Alternative C would result in fewer new residents and more jobs in the EIR Study Area than the proposed project, and therefore, would result in *less* demand on the public service providers that serve the EIR Study Area. However, potential future development under Alternative C would be required to comply with all existing and proposed new City regulations adopted to ensure that development pays its fair share of the cost of delivering services, providing park space, and libraries. As discussed in Chapter 4.15, the City has recently upgraded critical public service facilities and exceeds the existing parkland standard in General Plan 2020; therefore, Alternative C would not result in an increase in demand, which would be anticipated to result in a significant impact. Further, the payment of property taxes and development fees that would ensure that future development pays its fair share towards schools as dictated by Senate Bill 50 while City regulations would ensure future development pays its fair share towards potential increases in demand on library services. Overall, impacts under Alternative C would be *less* than those of the proposed project.

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### 5.6.2.16 TRANSPORTATION

As described in Chapter 4.16, Transportation, of this Draft EIR, the proposed project would result in two significant and unavoidable impacts related to transportation despite implementation of Mitigation Measures TRAN-1a and TRAN-1b. Both significant and unavoidable impacts are related to the inability of the proposed project to achieve the VMT reduction by 2040 of 15 percent below the baseline (2019) regional average. While the proposed General Plan 2040 results in a reduction in VMT Per Service Population by 2040, the VMT threshold of 15 percent below the current regional average would not be met.

As discussed in Chapter 4.16, Transportation, of this Draft EIR, the proposed project would result in a significant VMT impact for Total VMT Per Capita and Work VMT Per Employee and would not result in a significant Home VMT Per Resident impact. Both scenarios would result in similar development patterns, but Alternative C would yield fewer residential units and more jobs. Therefore, the Total VMT Per Service Population and Work VMT Per Employee would be *slightly* greater under Alternative C than the proposed project (28.3 Total VMT Per Capita compared to 28.1 Total VMT Per Capita and 16.1 Work VMT Per Employee compared to 17.3 Work VMT Per Employee).

Both Alternative C and the proposed project would include the improvements recognized in the Downtown Precise Plan and updated goals, policies, and programs that expand upon General Plan 2020 and to ensure the transportation system in the EIR Study Area is multi-modal and designed to increase bicycle and pedestrian access and safety. Impacts related to hazards from design features, emergency access, and conflicting with adopted plans or decrease performance standards, were found to be less than significant.

Overall, transportation impacts in the EIR Study Area under Alternative C would be *greater* when compared to the proposed project.

### 5.6.2.17 UTILITIES AND SERVICE SYSTEMS

As described in Chapter 4.17, Utilities and Service Systems, of this Draft EIR, impacts to sanitary wastewater, solid waste and stormwater infrastructure, and solid waste, under the proposed project, were found to be less than significant with the compliance of all applicable regulations. No mitigation measures are required.

Since Alternative C would result in less residential development, and thus, less water demand, wastewater and solid waste generation, impacts under the Alternative C would be *less* when compared to the proposed project.

### 5.6.2.18 WILDFIRE

Chapter 4.18, Wildfire, of this Draft EIR determined that, due to compliance with applicable local, regional, and State regulations, the proposed project would not impair the implementation of an emergency response or emergency evacuation plan. Additionally, potential future development as a result of the proposed project would not be located in an area that would expose persons to wildfire or wildfire

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pollutants, nor would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides. Finally, the proposed project would not result in the installation or maintenance of any infrastructure that could exacerbate fire risk or result in impacts to the environment.

Alternative C would result in lower-density development that would be located in the same locations as in the proposed project; would adopt the same goals, policies, and programs to reduce the risk of wildfire; and would not include the installation or maintenance of any infrastructure projects. Therefore, implementation of Alternative C would have *similar* impacts to the proposed project.

### 5.6.3 RELATIONSHIP OF THE ALTERNATIVES TO THE OBJECTIVES

As listed in Section 5.2, the primary purposes of the proposed project are to plan for the growth and conservation of San Rafael over a 20-year time horizon and to achieve a more equitable, sustainable, and prosperous future for all residents. This requires extending the buildout horizon to year 2040 and updating goals, policies, and programs so that they meet current State requirements and community priorities. As part of this process, the City drafted 2040 Guiding Principles, which build upon the framework of the vision, guiding principles, and goals of the current General Plan 2020 and reflect the community's desires for San Rafael's future. Big-picture objectives related specifically to growth include focusing growth in the Downtown Precise Plan Area, capitalizing on transit opportunities in and around PDAs, and streamlining future development that is consistent with the proposed project.

Alternative C would result in less housing and population growth in the EIR Study Area when compared to the proposed project. As discussed in Chapter 3, Project Description, of this Draft EIR, the proposed project specifically plans for infill development in existing urban areas near public transportation to meet the goals of the City. While the growth in Alternative C would occur in the same locations as included in the proposed project, Alternative C would result in less overall development, which would mean that the City would not meet their goal of providing adequate development to accommodate the growing population in the EIR Study Area. Therefore, Alternative C does not meet all the project objectives as outlined in the proposed project.

## 5.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an "environmentally superior" alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative to the proposed project that would be expected to generate the least number of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative to the proposed project selected may not be the alternative to the proposed project that best meets the goals or needs of San Rafael. Because CEQA Guidelines Section 15126.6(c) requires an evaluation of a reasonable range of alternatives to the proposed project, the proposed project under consideration cannot be identified as the environmentally superior alternative. Additionally, in accordance with CEQA Guidelines Section 15126.6(e)(2), if the

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environmentally superior alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

A summary of the impacts shown in Table 5-2 for each alternative is as follows:

- Alternative A would, in comparison to the project, result in *reduced* environmental impacts related to aesthetics, and utilities and service systems, but would ultimately result in *greater* impacts related to air quality, biological resources, cultural resources (historic buildings), energy, GHG emissions, noise (operational), and transportation.
- Alternative B would, in comparison to the project, result in reduced environmental impacts related to air quality, energy, GHG emissions, noise (operational), and transportation, but would result in *greater* impacts to cultural resources (historic buildings) and utilities and service systems.
- Alternative C would, in comparison to the project, would result in reduced environmental impacts related to aesthetics, cultural resources (historic buildings), and utilities and service systems, but would have greater impacts to related to air quality, energy, GHG emissions, noise (operational), and transportation.

Therefore, as shown in Table 5-2, Alternative B would be the environmentally superior alternative.

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