5. Alternatives to the Proposed Project

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 significant effects of the proposed project. The CEQA Guidelines set forth the intent and extent of alternatives analysis to be provided in an 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. The primary goal of the proposed project is to establish General Plan land use designations and zoning districts for the Southeast Greenway Area in order to plan for anticipated future uses while sustaining the community’s character. Building upon this primary goal, the following project objectives were established through a collaborative process:

- Provide a linear park with recreational uses including open space, educational and cultural opportunities, and active and passive recreation for residents and visitors.
ALTERNATIVES

- Provide continuous pedestrian, bicycle, and non-motorized transportation connections from Spring Lake Regional Park to Farmers Lane and links to downtown Santa Rosa, surrounding neighborhoods and schools, and the regional trail system.
- Provide opportunities for high-density residential, retail, commercial, and public/institutional land uses.
- Enhance and protect wetlands, wildlife habitat, groundwater and air quality through sustainable development practices.
- Support a walkable and livable neighborhood, promote economic vitality, and encourage social equity.
- Promote public safety and respect the character of adjacent neighborhoods.

5.3 SELECTION OF A REASONABLE RANGE OF ALTERNATIVES

Section 15126.6(c) of the State 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.

5.3.1 ALTERNATIVES CONSIDERED AND REJECTED

As described above, Section 15126.6(c) of the State CEQA Guidelines requires EIRs to 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. Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in and EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

As described in Chapter 3, Project Description, of this Draft EIR, on October 6, 2015, the City initiated a year-long planning process to identify alternative land uses for the project site. The City met with key stakeholders, held several community workshops, and established a Technical Advisory Committee to identify the community’s vision for the Southeast Greenway Area. Based on the feedback received, the City prepared Draft Guiding Principles and three alternatives for Land Use and Circulation Concepts for the project site. The Draft Guiding Principles focused on establishing a framework for land use planning, design, and development for the Southeast Greenway Area, while the alternatives included various options for connections for non-motorized travel linking Spring Lake Regional Park to Farmers Lane and beyond. The first alternative, the Minimal Footprint Alternative, emphasized parks and recreation and included up to 49.5 acres of park and recreational uses (including open space, habitat...
restoration/enhancement areas, urban agriculture uses, active and passive recreational uses, school facilities for joint-use recreation and/or outdoor classrooms, and community gathering space), 75 multi-family units, and 20,000 square feet of commercial space. The second alternative, the Active to Tranquil Alternative, emphasized a range of active development uses and a range of tranquil park and recreational uses in the eastern portion near Spring Lake Regional Park. The Active to Tranquil Alternative included up to 42 acres of park and recreational uses (including open space, habitat restoration/enhancement areas, urban agriculture uses, active and passive recreational uses, school facilities for joint-use recreation and/or outdoor classrooms, and community gathering space), 150 multi-family units, and 22,000 square feet of commercial space (including lodging). The third alternative, the Nodes of Activity Alternative, focused on nodes of housing and retail uses at the major streets and recreational and agricultural activity at the intersections of pathways. The Nodes of Activity Alternative included up to 46 acres of park and recreational uses (including open space, habitat restoration/enhancement areas, urban agriculture uses, active and passive recreational uses, school facilities for joint-use recreation and/or outdoor classrooms, and community gathering space), 120 multi-family units and 24,000 square feet of commercial space.

On November 1, 2016, the City Council and Planning Commission reviewed the Draft Guiding Principles and the three alternatives for Land Use and Circulation Concepts for the project site. The City Council and Planning Commission directed staff to include more housing and merge components of each alternative to create a single Draft Land Use and Circulation Concept alternative which is the proposed preferred alternative that is analyzed in this Draft EIR. Accordingly, the Minimal Footprint Alternative, the Active to Tranquil Alternative, and the Nodes of Activity Alternative were rejected because they did not meet the most basic project objectives.

### 5.3.2 ALTERNATIVES ANALYSIS

In accordance with the CEQA Guidelines, four project alternatives and the comparative merits of the alternatives are discussed below. All of 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, with the exception of some impacts associated with air quality and transportation and circulation, which were found to be significant and unavoidable with mitigation measures. 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:

- No Project Alternative
- No Commercial/Residential Development Alternative
- No Commercial Development
- Reduced Residential Development Alternative

The first alternative discussed is the CEQA-required “No Project” Alternative and assumes the project would not be approved and the project site would remain in its current condition and therefore, would not generate new residents or employees. The second alternative, the No Commercial/Residential Alternative, assumes that the entire 57-acre Southeast Greenway Area would be developed with public park and recreational uses, including open space, only and would not include opportunities for housing or commercial development; therefore, the implementation of this alternative would also not generate new residents or employees. The third alternative, the No Commercial Development Alternative, assumes no commercial development would occur within the Southeast Greenway Area; therefore, implementation of this alternative would only generate new residents and visitors using the open space. The fourth
alternative, the Reduced Residential Development Alternative, assumes a 50 percent reduction in the amount of future net new residential development (122 multi-family units compared to 244 units) within the Southeast Greenway Area with the same amount of commercial space as the proposed project (i.e., 12,000 square feet).

5.3.3 ASSUMPTIONS AND METHODOLOGY

The alternatives analysis is presented as a comparative analysis to the proposed project. As shown on Table 5-1, development intensity for each of the alternatives varies from the proposed project.

<table>
<thead>
<tr>
<th>Category</th>
<th>Proposed Project</th>
<th>No Project Alternative</th>
<th>No Commercial/Residential Alternative</th>
<th>No Commercial Development Alternative</th>
<th>Reduced Residential Development Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Residential Square Feet</td>
<td>12,000</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>12,000</td>
</tr>
<tr>
<td>Housing Units</td>
<td>244</td>
<td>0</td>
<td>0</td>
<td>244</td>
<td>122</td>
</tr>
<tr>
<td>Park and Recreational Acres</td>
<td>47.2</td>
<td>0</td>
<td>57</td>
<td>47.2</td>
<td>47.2</td>
</tr>
<tr>
<td>Population</td>
<td>632</td>
<td>0</td>
<td>0</td>
<td>632</td>
<td>316</td>
</tr>
<tr>
<td>Employees</td>
<td>40</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>40</td>
</tr>
</tbody>
</table>

Notes:
- a. Assumes 2.59 persons per household per Department of Finance, E-5 City/County Population and Housing Estimates, January 1, 2016.
- b. Assumes 300 square feet per employee consistent with the General Plan, Table 2-1, Permitted Densities/Intensities under General Plan, page 2-6.
- c. The “No Project Alternative” assumes no development would occur within the Southeast Greenway Area and the California Department of Transportation would retain ownership of the land.
- d. The “No Commercial/Residential Alternative” assumes that the entire 57-acre project site would be developed as public open space.
- e. The “No Commercial Development Alternative” assumes that no commercial development would occur within the Southeast Greenway Area.
- f. The “Reduced Residential Development Alternative” assumes a 50 percent reduction in the amount of residential development that would occur within the Southeast Greenway Area.

The alternatives analysis assumes that all applicable mitigation measures recommended for the proposed project, as well as the proposed General Plan policies would apply to each alternative. The following analysis compares the potentially significant environmental impacts of the four alternatives with those of the project-related impacts for each of the environmental topics analyzed in detail in Chapter 4.1 through Chapter 4.14 of this Draft EIR. The impacts of each alternative are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the proposed project. Table 5-2 below, summarizes the relative impacts of each of the alternatives to the proposed project, and the sections that follow describe them in detail.
### Table 5-2 Comparison of Impacts from Project Alternatives and the Proposed Project

<table>
<thead>
<tr>
<th>Topic</th>
<th>Proposed Project&lt;sup&gt;a&lt;/sup&gt;</th>
<th>No Project Alternative</th>
<th>No Commercial/Residential Alternative</th>
<th>No Commercial Development Alternative</th>
<th>Reduced Residential Density Alternative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aesthetics</td>
<td>LTS</td>
<td>&lt;</td>
<td>&lt;</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>Air Quality</td>
<td>SU&lt;sup&gt;b&lt;/sup&gt;</td>
<td>&lt;</td>
<td>&lt;</td>
<td>&lt;</td>
<td></td>
</tr>
<tr>
<td>Biological Resources</td>
<td>LTS/M</td>
<td>&lt;</td>
<td>&lt;</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>Cultural and Tribal</td>
<td>LTS/M</td>
<td>&lt;</td>
<td>=</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>Cultural Resources</td>
<td>LTS</td>
<td>&lt;</td>
<td>&lt;</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>Geology and Soils</td>
<td>LTS</td>
<td>&lt;</td>
<td>&lt;</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>Greenhouse Gas Emissions</td>
<td>LTS</td>
<td>&lt;</td>
<td>&lt;</td>
<td>&lt;</td>
<td></td>
</tr>
<tr>
<td>Hazards and Hazardous</td>
<td>LTS</td>
<td>&lt;</td>
<td>&lt;</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>Materials</td>
<td>LTS</td>
<td>&lt;</td>
<td>&lt;</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>Hydrology and Water Quality</td>
<td>LTS</td>
<td>&lt;</td>
<td>&lt;</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>Land Use and Planning</td>
<td>LTS</td>
<td>&lt;</td>
<td>=</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>Noise</td>
<td>LTS</td>
<td>&lt;</td>
<td>&lt;</td>
<td>&lt;</td>
<td>&lt;</td>
</tr>
<tr>
<td>Population and Housing</td>
<td>LTS</td>
<td>&lt;</td>
<td>&lt;</td>
<td>=</td>
<td>&lt;</td>
</tr>
<tr>
<td>Public Services and</td>
<td>LTS</td>
<td>&lt;</td>
<td>&lt;</td>
<td>=</td>
<td>&lt;</td>
</tr>
<tr>
<td>Recreation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transportation and</td>
<td>SU&lt;sup&gt;c&lt;/sup&gt;</td>
<td>&lt;</td>
<td>=</td>
<td>=</td>
<td>=</td>
</tr>
<tr>
<td>Circulation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Utilities and Service</td>
<td>LTS</td>
<td>&lt;</td>
<td>&lt;</td>
<td>&lt;</td>
<td>&lt;</td>
</tr>
<tr>
<td>Systems</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Notes:

- <sup>a</sup> The impacts listed in this column represent the highest significance determination for each respective threshold.
- <sup>b</sup> Indicates an impact at the program-level and does not directly preclude a finding of less than significant at the project-level.
- <sup>c</sup> Represents impacts to which there is no funding to implement measures that could potentially mitigate the impacts; therefore, it is infeasible for the City to implement the measures that would reduce the impact.

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### 5.4 No Project Alternative

#### 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. Under this alternative, the proposed project would not be constructed, and the project site would remain in its current condition.
The Southeast Greenway Area is comprised of approximately 57 acres of land located in southeast Santa Rosa and is currently owned by the California Department of Transportation (Caltrans). Under the No Project Alternative, Caltrans would retain ownership of the project site and the area would remain closed to the public. Accordingly, the project site does not currently have a General Plan land use designation and the zoning districts are preliminary or “remnant” zoning districts that do not authorize specific land uses. As described in Chapter 3, Project Description, of this Draft EIR, the Southeast Greenway Area is divided into three large subareas; West Subarea, Central Subarea, and East Subarea. The existing land uses of each subarea are as follows:

- **West Subarea:** The 18.3-acre West Subarea is primarily comprised of grassland with numerous swales, and potential wetlands from Farmers Lane to Wanda Way. Matanzas Creek is located within this subarea, and there are a number of drainage swales that collect runoff from the property and some adjoining properties.

- **Central Subarea:** The 22.6-acre Central Subarea is primarily comprised of undeveloped land with trees along the perimeter and remnant walnut orchard on the eastern portion of the site between Wanda Way/Camden Court to Summerfield Road. The Central Subarea is primarily composed of Sierra Park Creek and Spring Creek, tributaries of Matanzas Creek, flow through this subarea.

- **East Subarea:** The 16.3-acre East Subarea is primarily composed of grassland and rocky outcroppings, oak woodlands, two potential wetlands, and a small remnant walnut orchard from Summerfield Road to Spring Lake Regional Park. This subarea does not have any creeks, but there are a number of drainage swales that collect runoff from the property and some adjoining properties.

As shown in Table 5-1, under the No Project Alternative potential future development of park and recreational uses including open space, multi-family residential, and commercial space would not occur. Accordingly, the No Project Alternative would not introduce new residents or employees to the Southeast Greenway Area.

### 5.4.2 IMPACT DISCUSSION

The following analysis compares the potentially significant environmental impacts of the No Project Alternative with those of the project-related impacts for each of the environmental topics analyzed in detail in Chapter 4.1 through Chapter 4.14 of this Draft EIR. The impacts of each alternative are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the proposed project.

- **Aesthetics:** Under the No Project Alternative, the project site would remain unchanged and no habitat modifications would result. As such, potential impacts to a designated scenic vista or the visual quality or character in the vicinity of the project site would not occur. Therefore, potential impacts to aesthetic resources would be *less* than the proposed project.

- **Air Quality:** No new buildings would be constructed on the project site under the No Project Alternative. As such, the No Project Alternative would not result in future construction or operation activities that have the potential to generate air pollutants or violate air quality standards. Therefore, overall air quality impacts under the No Project Alternative would be *less*.

- **Biological Resources:** Potential impacts to special-status species, riparian habitat, wetlands and other waters, and wildlife movement opportunities or native nurseries would not occur under this
alternative. However, as described in Chapter 3, Project Description, of this Draft EIR, implementation of the proposed project would result in the restoration of the remnant orchard and the areas surrounding the three creeks that traverse the project site. These areas would remain unchanged and closed to the public under the No Project Alternative. Nevertheless, given that no new development potential would occur on the project site under the No Project Alternative, overall impacts to biological resources would be less when compared to the proposed project.

- **Cultural and Tribal Cultural Resources:** Given, that no ground-disturbing activities would occur, this alternative would not have the potential to damage or destroy unknown archaeological or paleontological resources, human remains, and tribal cultural resources. Accordingly, the potential to impact a cultural resource would be less.

- **Geology and Soils:** The No Project Alternative would also reduce the potential for damage to structures from soil/geologic conditions (i.e., seismicity and ground shaking; flooding; liquefaction, lateral spreading; geologic and soil instabilities; soil erosion/loss of topsoil; expansive and corrosive soils; and groundwater) that could result from future development under the proposed project. Therefore, under this alternative, impacts related to geology and soils would be less when compared to the proposed project.

- **Greenhouse Gas Emissions:** With respect to greenhouse gas (GHG) emissions, no new vehicular trips would be generated and no new buildings would be constructed that would have the potential to generate new GHG emissions; therefore, the No Project Alternative would result in less GHG emissions. However, it is important to note that the Southeast Greenway proposed project would introduce land uses that support alternative modes of transportation and would increase non-vehicular connections in the region and result in infill development that places housing and retail near existing similar uses. These benefits would not be seen under this alternative.

- **Hazards and Hazardous Materials:** No new transport or release of hazardous materials would occur under the No Project Alternative. Therefore, impacts related to hazards and hazardous materials of the proposed project would be less under the No Project Alternative.

- **Hydrology and Water Quality:** The No Project Alternative would not generate contaminants from demolition and construction that could contaminate stormwater or increase the amount of impervious surfaces. Therefore, impacts related to hydrology and water quality would be less under the No Project Alternative when compared to the proposed project.

- **Land Use and Planning:** Because the No Project Alternative would not involve any new development potential, the site would remain in its current condition. Consequently, Caltrans would retain ownership of the project site and the General Plan 2035 would not be amended to include land use designations and conforming zoning for Southeast Greenway Area to increase connectivity, housing, retail and parkland in the city and restore habitat. Overall, the No Project Alternative would not further the objectives of applicable land use plans such as the General Plan 2035, including meeting the housing needs of the City, Climate Action Plan, Plan Bay Area, the Bicycle and Pedestrian Master Plan, and the Citywide Creek Master Plan. Thus, while the No Project Alternative does not achieve the goals of these planning documents, leaving the area “as is” would not necessarily result in a physical impact on the environment. As such, impacts are considered to be less when compared to the proposed project.
\section*{Alternatives}

- **Noise:** Under the No Project Alternative, the project site would remain vacant and future construction or operational activities would not occur. Accordingly, the No Project Alternative would not substantially increase noise levels in the project vicinity or expose people to noise in excess of local standards. Therefore, noise related impacts under the No Project Alternative would be \textit{less} than that of the proposed project.

- **Population and Housing:** Given that the project site would remain vacant under the No Project Alternative, this alternative would not induce substantial population growth, displace housing, or displace substantial numbers of people. Accordingly, impacts related to population and housing would be \textit{less} under the No Project Alternative when compared to the proposed project.

- **Public Services and Recreation:** The No Project Alternative would not introduce new park-users, residents or employees to the Southeast Greenway Area. Accordingly, the No Project Alternative would not increase demand for services provided by the Santa Rosa Fire Department, Santa Rosa Police Department, Santa Rosa City School District, Rincon Valley Union School District, and the Sonoma County Library System. Therefore, impacts to these service providers would be \textit{less} when compared to the proposed project.

As described in Chapter 4.12, Public Services and Recreation, of this Draft EIR, the City currently does not meet its adopted parkland standard of 6 acres per 1,000 residents. The proposed project would contribute up to 47.2 acres to the City’s goals for providing recreational opportunities to the residents of Santa Rosa. Given that the project site would remain vacant and inaccessible under the No Project Alternative, the City would not be unable to meet their current adopted parkland ratio the same as could be met under the proposed project. However, meeting this ratio does not necessarily equate with a physical impact on the environment. As such, impacts are considered to be \textit{less} when compared to the proposed project when compared to the proposed project.

- **Transportation and Circulation:** As discussed in Chapter 4.13, Transportation and Circulation, of this Draft EIR, the Farmers Lane and Hoen Avenue Frontage Road intersection currently operates at level of service (LOS) E which violates the General Plan 2035 criteria of LOS D or better for corridors. The intersection would remain at LOS E under the No Project Alternative. However, under this alternative no new automobile trips would be generated; therefore, impacts would be \textit{less} when compared to the proposed project. It is important to note, that similar to GHG emission, this alternative would not see the benefits to potentially reducing automobile trips from increasing multi-modal transportation options.

- **Utilities and Service Systems:** Under the No Project Alternative, no new development potential on the site would occur and there would be no changes to the demand for water supply on the project site. Therefore, there would be no wastewater, solid waste, stormwater, or energy increases under the No Project Alternative. Accordingly, overall impacts to utilities and service systems would be \textit{less} when compared to the proposed project.

\section*{Impact Summary}

As described above, because no conditions would change as a result of selecting the No Project Alternative, the overall impacts under all the environmental topic areas would be \textit{less} than those of the proposed project.
5.4.4 RELATIONSHIP OF THE ALTERNATIVE TO THE OBJECTIVES

Under the No Project Alternative, the proposed project would not be constructed and therefore, this alternative does not meet any of the project objectives.

5.5 NO COMMERCIAL/RESIDENTIAL ALTERNATIVE

5.5.1 DESCRIPTION

Under the No Commercial/Residential Alternative, the entire 57-acre project site would be developed with public park and recreational uses including open space, which represents a 9.8 acre increase in park and recreational uses from that of the proposed project. As described in the Section 3.5.1.1, Proposed Land Use Concept, in Chapter 3, Project Description, of this Draft EIR, the proposed Park and Recreation land use designation could include the following land uses: greenway, public plaza, natural open space, creek restoration, school facilities, community gathering place, and urban agriculture. The proposed Circulation Concept would also be implemented under the No Commercial/Residential Alternative, and would introduce multi-modal access points, crossings, and connections throughout the Southeast Greenway Area. In addition, under this alternative, the General Plan 2035 would be amended to include land use and conforming zoning districts to allow future development of public park and recreational uses including open space on the project site. This alternative would not introduce new residents or employees to the project site.

5.5.2 IMPACT DISCUSSION

The following analysis compares the potentially significant environmental impacts of the No Commercial/Residential Alternative with those of the project-related impacts for each of the environmental topics analyzed in detail in Chapter 4.1 through Chapter 4.14 of this Draft EIR. The impacts of each alternative are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the proposed project.

- **Aesthetics**: Similar to the proposed project, the No Commercial/Residential Alternative would result in modifications to the visual landscape and existing habitat on the project site. As discussed in Chapter 4.1, Aesthetics, views from street-level public viewing to the scenic vistas are intermittently obstructed by existing conditions surrounding the project area with potential height increases site such as buildings, structures, and mature trees. Additionally, the publically accessible areas surrounding the project site are not recognized by the City or the State as scenic viewing locations. In addition, similar to the proposed project, development under the No Commercial/Residential Alternative would be subject to design review per Santa Rosa City Code (SRCC) Section 20-52.030, as required, and would be required to comply with the General Plan 2035 Urban Design Policies. However, because no commercial or residential buildings would be constructed, the potential impacts to aesthetic resources under the No Commercial/Residential Alternative would be **less** to the proposed project.

- **Air Quality**: Development under the proposed project has the potential to generate a net increase in criteria air pollutant emissions that would exceed the Bay Area Air Quality Management District
Operational criteria air pollutant emissions would be generated from on-site area sources (e.g., landscaping fuel) and park-users’ vehicle trips generated by the proposed project. Construction emissions associated with individual development projects under the proposed project would generate an increase in criteria air pollutants and Toxic Air Contaminants (TACs). Impacts associated with these effects were found to be significant and unavoidable at the programmatic level. Development resulting from the No Commercial/Residential Alternative would be less intense when compared to the proposed project and would not involve the construction or residential or commercial development, but would increase park and recreational land uses by 9.8 acres (57 acres compared to 47.2 acres). Therefore, the operational and construction criteria air pollutant emissions generated by the No Commercial/Residential Alternative would be less when compared to the proposed project.

- **Biological Resources:** As discussed in Chapter 4.3, Biological Resources, of this Draft EIR, development under the proposed project could impact special-status species, riparian habitat, wetlands and other waters, and wildlife movement opportunities or native nurseries in the Southeast Greenway Area; however, compliance with applicable federal, State, and local regulations as well as the proposed mitigation measures, would reduce potential impacts to a less-than-significant level. Similar to the proposed project, the No Commercial/Residential Alternative would be required to comply with the applicable regulations and proposed mitigation measures. However, because no commercial or residential development potential would occur and park and recreational land uses would increase by 9.8 acres (57 acres compared to 47.2 acres), impacts to biological resources under the No Commercial/Residential Alternative are considered to be less when compared to the proposed project.

- **Cultural and Tribal Cultural Resources:** Under the No Commercial/Residential Alternative, future development of public parks and recreational uses including open space in the Southeast Greenway Area would occur over a greater area when compared to the proposed project (57 acres compared to 47.2 acres), but overall building construction would be less intense than the proposed project without any commercial or residential development. Similar to the proposed project, development under this alternative would involve ground-disturbing activities during construction of future structures which could affect unknown cultural and Tribal Cultural Resources. Consequently, future development under the No Commercial/Residential Alternative would be subject to existing federal, State, and local regulations laws to protect cultural resources, which would ensure less-than-significant impacts to cultural and Tribal Cultural Resources. In addition, the No Commercial/Residential Alternative would be required to comply with mitigation measures as recommended under the proposed project. Therefore, because the overall ground-disturbing activities could be similar under this alternative the potential impacts to cultural or Tribal Cultural Resources under the No Commercial/Residential Alternative would be similar to the proposed project.

- **Geology and Soils:** The No Commercial/Residential Alternative would not include residential or commercial development that would be subject to potential for damage from soil and geologic conditions (i.e., seismicity and ground shaking; flooding; liquefaction, lateral spreading; geologic and soil instabilities; soil erosion/loss of topsoil; expansive and corrosive soils; and groundwater). While greater development associated with park and recreational uses including open space would occur under this alternative (57 acres compared to 47.2 acres), because there are fewer
structures subject to damage, the impacts related to geology and soils would be less when compared to the proposed project.

- **Greenhouse Gas Emissions:** With respect to GHG emissions, the proposed project would not result in any significant GHG emissions impacts as it would not exceed the per capita significance threshold for GHG emissions, nor would the proposed project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG emissions, as described in Chapter 4.6, Greenhouse Gas Emissions, of this Draft EIR. Given that development under the No Commercial/Residential Alternative would result in no commercial and residential development, but would result in park and recreational uses including open space (57 acres compared to 47.2 acres), this alternative would result in less GHG emissions when compared to the proposed project. It is important to note, that like the proposed project, this alternative does realize the benefits of reducing GHG emissions related to supporting alternate modes of non-vehicular travel, but does not realize the GHG emission reduction benefits associated with infill development from locating residential and retail uses in areas with existing nearby land uses to reduce vehicular trips.

- **Hazards and Hazardous Materials:** As described in Chapter 4.7, Hazards and Hazardous Materials, the proposed project would be required to comply with existing federal, State, and local regulations related to the safe use, handling, disposal, transport, and generation of hazardous materials. In addition, like the proposed project there are no public airports or private airstrips within 2 miles of the project site. Similar to the proposed project, the No Commercial/Residential Alternative would be required to comply with the applicable laws, regulations, and conditions of approval, which would minimize potential impacts related to hazard and hazardous materials. Under this alternative, no commercial or residential development would occur; therefore, any hazardous materials associated with their construction or operation would not be transported to or be present on the site. Accordingly, impacts associated with hazard and hazardous materials would be less when compared to the proposed project.

- **Hydrology and Water Quality:** The No Commercial/Residential Alternative would not result in residential or commercial development; therefore, this alternative could result in less impervious surfaces on the project site because parks and recreation land uses including open space would be greater than the proposed project (57 acres compared to 47.2 acres). The No Commercial/Residential Alternative would 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 would be minimized as any potential future development occurs. Given, that the No Commercial/Residential Alternative would result in less developed impervious surfaces, overall impacts related to hydrology and water quality would be less when compared to the proposed project.

- **Land Use and Planning:** Under the No Commercial/Residential Alternative the General Plan 2035 would be amended to allow for public parks and recreational uses including open space on the project site. Similar to the proposed project, the No Commercial/Residential Alternative would be required to comply with and further the objectives of applicable land use plans such as the General Plan 2035, Climate Action Plan, Plan Bay Area, the Bicycle and Pedestrian Master Plan, and the Citywide Creek Master Plan. Thus, impacts related to land use objectives would be similar under the No Commercial/Residential Alternative. It is important to note that this alternative does
not contribute to meeting the City’s housing needs; however, because the site was not previously designated as land with potential housing potential, this is not considered to be an impact.

- **Noise:** Similar to the proposed project, development under the No Commercial/Residential Alternative would result in temporary and permanent increases to ambient noise levels. Accordingly, this alternative would be subject to the General Plan 2035 policies, noise standards in the SRCC, and applicable best management practices described in Chapter 4.10, Noise, of this Draft EIR. Given that the No Commercial/Residential Alternative would result in no residential and commercial development than that of the proposed project, noise related impacts under this alternative would be less when compared to the proposed project.

- **Population and Housing:** Under the No Commercial/Residential Alternative, no residential or commercial development would occur on the project site. Although this alternative would attract park users to the area, individuals would not reside on the project site. Accordingly, this alternative would not induce substantial growth, displace housing, or displace substantial numbers of people. Therefore, impacts related to population and housing would be less under the No Commercial/Residential Alternative when compared to the proposed project.

- **Public Services and Recreation:** The No Commercial/Residential Alternative would introduce park users to the Southeast Greenway Area. This could increase the demand of the Santa Rosa Fire Department and Santa Rosa Police Department during park hours. However, given that no new residents would be introduced to the areas, the demand would be less when compared to the proposed project. In addition, the No Commercial/Residential Alternative would not generate additional housing with school-aged children and new residents that could use the Sonoma County Library System. Therefore, impacts to fire, police, schools and libraries would be less than those of the proposed project.

With respect to recreational services, similar to the proposed project the No Commercial/Residential Alternative would contribute to the City’s adopted parkland ratio and the demand would be less without the addition of new residents to Santa Rosa. Accordingly, the impacts would be less when compared to the proposed project.

- **Transportation and Circulation:** As discussed in Chapter 4.13, Transportation and Circulation, of this Draft EIR, impacts from new vehicular traffic would result in significant impacts at some intersections and corridors under Existing plus Project Conditions and Future plus Project. Because no new residential or commercial land uses would be introduced under this alternative, vehicular trips would not be generated by these uses. However, there is the potential for more park-users with the additional park and recreational space under this alternative. Because the significant and unavoidable impacts under the proposed project would occur at the Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), which currently operates unacceptably at LOS E during the PM peak hour, this condition would remain with or without additional trips under this alternative. The City’s ongoing plans to improve the Farmers Lane extension between Bennett Valley Road and Petaluma Hill Road that would change traffic patterns at the Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), resulting in more efficient operation, would continue under this alternative, eventually reducing the impact. Additionally, measures to reduce impacts to the Farmers Lane/Fourth Street-Sonoma Highway intersection (#1), would also be unachievable due to unknown funding sources. This condition would remain under this alternative as well. All recommended mitigation measures
to improve pedestrian and bicycle facilities would occur under this alternative. While the number of vehicular trips would vary from that of the proposed project, because conditions at the Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8) are currently unacceptable, the addition of vehicular trips under this alternative is assumed to have similar impacts when compared to the proposed project.

- **Utilities and Service Systems:** Under the No Commercial/Residential Alternative, the 57-acre project site would be developed into public parks and recreational uses including open space. As such, this alternative would decrease the demand for water supply, wastewater, solid waste, stormwater, and energy on the project site resulting from the proposed commercial and residential uses. However, given that the No Commercial/Residential Alternative does not include residential or commercial development, the demand for services would be less than the proposed project. Accordingly, overall impacts to utilities and service systems would be less when compared to the proposed project.

### 5.5.3 IMPACT SUMMARY

As described above, because no residential or commercial development would occur as a result of selecting the No Commercial/Residential Alternative, impacts under most of the environmental topic areas would be less than those of the proposed project with the exception of cultural and Tribal Cultural Resources, land use and planning, and transportation and circulation.

As described above, the area of ground disturbance would be similar under both the No Commercial/Residential Alternative and the proposed project; therefore, impacts to unknown cultural and Tribal Cultural Resources would be similar. For land use and planning, development under both scenarios would be required to comply with the existing regulations and plans for the City of Santa Rosa; thus, impacts would be similar. With respect to transportation and circulation, both scenarios would generate trips that would impact the already impacted Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), which currently operates unacceptably at LOS E during the PM peak hour. For these reasons, impacts under these three topic areas were found to have similar impacts to those of the proposed project.

### 5.5.4 RELATIONSHIP OF THE ALTERNATIVE TO THE OBJECTIVES

The No Commercial/Residential Alternative would generally comply with the project objectives by providing a 57-acre linear park with park and recreational uses, including open space, and multi-modal transportation opportunities. The No Commercial/Residential Alternative would also provide opportunities for the enhancement and protection of biological resources on the project site. However, this alternative would not provide opportunities for high-density residential, retail, and commercial uses. Therefore, this alternative would not meet all of the project objectives.
5.6 NO COMMERCIAL DEVELOPMENT ALTERNATIVE

5.6.1 DESCRIPTION

Under the No Commercial Development Alternative, the project site would be developed with 47.2 acres of public parks and recreational land uses, including open space, and 244 multi-family housing units as shown on Figure 3-9 in Chapter 3, Project Description, of this Draft EIR. Because the commercial uses would occur as part of mixed-use development project, the amount of area designated for just residential is the same as that under the proposed project (i.e., 3.7 acres along Vallejo Street, 4.7 acres at the terminus of SR 12, and 1.2 acres west of Yulupa Avenue). Similar to the proposed project the Circulation Concept would also be implemented under the No Commercial Development Alternative. In addition, under this alternative, the General Plan 2035 would be amended to include land use and conforming zoning districts to allow future development of public parks and recreational land uses, including open space, and residential development on the project site. As shown in Table 5-1, the No Commercial Development Alternative would introduce 632 new residents to the Southeast Greenway Area. This alternative would not introduce new employees to the project site.

5.6.2 IMPACT DISCUSSION

The following analysis compares the potentially significant environmental impacts of the No Commercial Alternative with those of the project-related impacts for each of the environmental topics analyzed in detail in Chapter 4.1 through Chapter 4.14 of this Draft EIR. The impacts of each alternative are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the proposed project.

- **Aesthetics**: Similar to the proposed project, the No Commercial Development Alternative would result in modifications to the visual landscape and existing habitat on the project site. As discussed in Chapter 4.1, Aesthetics, views from street-level public viewing to the scenic vistas are intermittently obstructed by existing conditions surrounding the project area with potential height increases site such as buildings, structures, and mature trees. Additionally, the publically accessible areas surrounding the project site are not recognized by the City or the State as scenic viewing locations. In addition, similar to the proposed project, development under No Commercial Development Alternative would be subject to design review per Santa Rosa City Code (SRCC) Section 20-52.030, and would be required to comply with the General Plan 2035 Urban Design policies. Therefore, potential impacts to aesthetic resources under the No Commercial Development Alternative would be similar to the proposed project.

- **Air Quality**: Development under the proposed project would generate a substantial net increase in criteria air pollutant emissions that would exceed the Bay Area Air Quality Management District (BAAQMD) regional significance thresholds. Operational criteria air pollutant emissions would be generated from on-site area sources (e.g., landscaping fuel) and park-user and residents’ vehicle trips generated by the proposed project. Construction emissions associated with individual development projects under the proposed project would generate an increase in criteria air pollutants and Toxic Air Contaminants (TACs). Impacts associated with these effects were found to be significant and unavoidable at the programmatic level. Although development resulting from the No Commercial Development Alternative would be less intense when compared to the
proposed project, it is likely that the operational and construction criteria air pollutant emissions would still generate a substantial net increase in criteria air pollutant emissions. However, because no commercial development would occur, the impacts to air quality under the No Commercial Development Alternative would be less than the proposed project.

- **Biological Resources:** As discussed in Chapter 4.3, Biological Resources, of this Draft EIR, development under the proposed project could impact special-status species, riparian habitat, wetlands and other waters, and wildlife movement opportunities or native nurseries in the Southeast Greenway Area; however, compliance with applicable federal, State, and local regulations as well as the proposed mitigation measures, would reduce potential impacts to a less-than-significant level. Similar to the proposed project, the No Commercial Development Alternative would be required to comply with the applicable regulations and proposed mitigation measures. Therefore, for these reasons and because the development footprint would be similar to that of the proposed project, the impacts to biological resources under the No Commercial Development Alternative would be similar when compared to the proposed project.

- **Cultural and Tribal Cultural Resources:** Under the No Commercial Development Alternative, future development of public parks and recreational land uses including open space and multi-family housing in the Southeast Greenway Area would still occur. Similar to the proposed project, development under this alternative would involve the same level of ground-disturbing activities during construction of future structures which could affect unknown cultural and Tribal Cultural Resources. Consequently, future development under the No Commercial Development Alternative would be subject to existing federal, State, and local regulations laws to protect cultural and Tribal Cultural Resources, which would ensure less-than-significant impacts to cultural and Tribal Cultural Resources. In addition, the No Commercial Development Alternative would be required to comply with mitigation measures as recommended under the proposed project. Therefore, because the overall ground-disturbing activities could be similar, the potential impacts to cultural or Tribal Cultural Resources under the No Commercial Development Alternative would be similar to the proposed project.

- **Geology and Soils:** The No Commercial Development Alternative would result in the development of public parks and recreational land uses including open space and multi-family housing on the project site. Similar to the proposed project, this alternative would result in the potential for damage to structures from soil and geologic conditions (i.e., seismicity and ground shaking; flooding; liquefaction, lateral spreading; geologic and soil instabilities; soil erosion/loss of topsoil; expansive and corrosive soils; and groundwater). Therefore, this alternative would result in similar impacts related to geology and soils.

- **Greenhouse Gas Emissions:** With respect to GHG emissions, the proposed project would not result in any significant GHG emissions impacts as it would not exceed the per capita significance threshold for GHG emissions, nor would the proposed project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG emissions, as described in Chapter 4.6, Greenhouse Gas Emissions, of this Draft EIR. Given that the No Commercial Alternative would result in no commercial development, this alternative would result in less GHG emissions when compared to the proposed project. It is important to note, that like the proposed project, this alternative does realize the benefits of reducing GHG emissions related to supporting alternate modes of non-vehicular modes of travel, but does not realize the GHG
emission reduction benefits associated with infill development from locating commercial/retail uses in areas with existing nearby land uses to reduce vehicular trips.

- **Hazard and Hazardous Materials**: As described in Chapter 4.7, Hazards and Hazardous Materials, the proposed project would be required to comply with existing federal, State, and local regulations related to the safe use, handling, disposal, transport, and generation of hazardous materials. In addition, like the proposed project there are no public airports or private airstrips within 2 miles of the project site. Similar to the proposed project, the No Commercial Development Alternative would be required to comply with the applicable laws, regulations, and conditions of approval, which would minimize potential impacts related to hazard and hazardous materials. Accordingly, impacts associated with hazard and hazardous materials would be *similar* when compared to the proposed project.

- **Hydrology and Water Quality**: Although the No Commercial Development Alternative would not result in commercial development, this alternative would increase the amount of impervious surfaces on the project site similar to that of the proposed project. As such, the No Commercial Development Alternative would 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 would be minimized as future development occurs. Accordingly, impacts related to hydrology and water quality under the No Commercial Development Alternative would be *similar* when compared to the proposed project.

- **Land Use and Planning**: Under the No Commercial Development Alternative the General Plan 2035 would be amended to allow for public parks and recreational land uses, including open space, and residential land uses on the project site. Similar to the proposed project, the No Commercial Development Alternative would be required to comply with and further the objectives of applicable land use plans such as the General Plan 2035, Climate Action Plan, Plan Bay Area, the Bicycle and Pedestrian Master Plan, and the Citywide Creek Master Plan. Thus, impacts related to land use objectives would be *similar* under the No Commercial Development Alternative.

- **Noise**: Similar to the proposed project, development under the No Commercial Development Alternative would result in temporary and permanent increases to ambient noise levels. Accordingly, this alternative would be subject to General Plan 2035 policies, noise standards in the SRCC, and applicable best management practices described in Chapter 4.10, Noise, of this Draft EIR. Given that the level of development under the No Commercial Development Alternative would be less than that of the proposed project, noise related impacts under this alternative would be *less* when compared to the proposed project.

- **Population and Housing**: As discussed in Chapter 4.11, Population and Housing, the proposed project would not induce substantial unplanned growth, displace housing, or displace substantial numbers of people. Similar to the proposed project, the No Commercial Development Alternative would be required to comply with General Plan 2035 Housing policies which seek to provide adequate housing opportunities for all residents. Given, that the No Commercial Development Alternative would result in the same amount of residential development as the proposed project, impacts related to population and housing would be *similar* when compared to the proposed project.
**Public Services and Recreation:** As discussed in Chapter 4.12, Public Services, the proposed project would not require the expansion of police, fire, school, or library facilities. In addition, the proposed project would contribute to the City’s adopted parkland ratio. Given that the No Commercial Development Alternative would result in the same amount of residential development and park and recreational land uses including open space as the proposed project, impacts on public service providers would be *similar* when compared to the proposed project.

**Transportation and Circulation:** As discussed in Chapter 4.13, Transportation and Circulation, of this Draft EIR, impacts from new vehicular traffic would result in significant impacts at some intersections and corridors under Existing plus Project Conditions and Future plus Project Conditions. Because no new commercial land uses would be introduced under this alternative, vehicular trips would not be generated by this use. Because the significant and unavoidable impacts under the proposed project would occur at the Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), which currently operates unacceptably at LOS E during the PM peak hour, this condition would remain with or without additional trips under this alternative. The City’s ongoing plans to improve the Farmers Lane extension between Bennett Valley Road and Petaluma Hill Road that would change traffic patterns at the Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), resulting in more efficient operation, would continue under this alternative, eventually reducing the impact. Additionally, measures that could potentially reduce impacts to the Farmers Lane/Fourth Street-Sonoma Highway intersection (#1), would also be unachievable due to unknown funding sources. This condition would remain under this alternative as well. All recommended mitigation measures to improve pedestrian and bicycle facilities would occur under this alternative. While the number of vehicular trips would vary from that of the proposed project, because the conditions at the Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8) are currently unacceptable, the addition of vehicular trips under this alternative is assumed to have *similar* impacts when compared to the proposed project.

**Utilities and Service Systems:** Under the No Commercial Development Alternative, development of the 57-acre project site would include public parks and recreational land uses including open space and multi-family housing. As such, this alternative would increase the demand for water supply, wastewater, solid waste, stormwater, and energy on the project site. However, given that the No Commercial Development Alternative does not include commercial development, the demand for services would be slightly less than the proposed project. Accordingly, overall impacts to utilities and service systems would be *less* when compared to the proposed project.

### 5.6.3 IMPACT SUMMARY

As described above, because no commercial development would occur as a result of selecting the No Commercial Alternative, impacts with respect to air quality, GHG emissions, noise, and utilities and service providers would be *less* than those of the proposed project.

Under the No Commercial Alterative, the potential for residential development would still occur on the site; therefore, geological and hazards and hazardous materials related to structures and residential development would be *similar* to those of the proposed project.
The same amount of housing and the same amount of new residents would occur under both the No Commercial Alternative and the proposed project; thus, impacts related to population and housing, and public services and recreation would be similar to those of the proposed project.

For land use and planning, future potential development under both scenarios would be required to comply with the existing regulations and plans for the City of Santa Rosa; thus, impacts would be similar to those of the proposed project.

With respect to transportation and circulation, both scenarios would generate trips that would impact the already impacted Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), which currently operates unacceptably at LOS E during the PM peak hour. Therefore, impacts were found to be similar to those of the proposed project.

5.6.4 RELATIONSHIP OF THE ALTERNATIVE TO THE PROJECT OBJECTIVES

The No Commercial Development Alternative would generally comply with the project objectives by providing a 47.2-acre linear park with park and recreational uses, multi-family housing, and multi-modal opportunities. The No Commercial Development Alternative would also provide opportunities for the enhancement and protection of biological resources on the project site. However, this alternative would not provide opportunities for retail and commercial uses. Therefore, this alternative would not meet all of the project objectives.

5.7 REDUCED RESIDENTIAL DENSITY ALTERNATIVE

5.7.1 DESCRIPTION

Under the Reduced Residential Density Alternative, the multi-family housing proposed in the Southeast Greenway Area would be reduced by 50 percent, but would remain in the same areas designated for such uses as that of the proposed project (see Figure 3-9 in Chapter 3, Project Description, of this Draft EIR). These areas include the 3.7-acre parcel along Vallejo Street, 4.7-acre parcel at the terminus of SR 12, and 1.2-acres at the west of Yulupa Avenue. Therefore, this alternative would result in new development potential for 47.2 acres of public parks and recreational land uses including open space, 122 multi-family housing units, and 12,000 square feet of commercial development. Similar to the proposed project, the Circulation Concept would also be implemented under the Reduced Residential Density Alternative. The General Plan 2035 would also be amended under this alternative to include land use and conforming zoning districts to allow future development of public parks and recreational land uses including open space, multi-family housing, and commercial development on the project site. As shown in Table 5-1, the Reduced Residential Density Alternative would introduce 316 residents and 40 employees to the Southeast Greenway Area.
5.7.2 IMPACT DISCUSSION

The following analysis compares the potentially significant environmental impacts of the Reduced Residential Density Alternative with those of the project-related impacts for each of the environmental topics analyzed in detail in Chapter 4.1 through Chapter 4.14 of this Draft EIR. The impacts of each alternative are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the proposed project.

- **Aesthetics:** Similar to the proposed project, the Reduced Residential Density Alternative would result in modifications to the visual landscape and existing habitat on the project site. As discussed in Chapter 4.1, Aesthetics, views from street-level public viewing to the scenic vistas are intermittently obstructed by existing conditions surrounding the project area with potential height increases site such as buildings, structures, and mature trees. Additionally, the publically accessible areas surrounding the project site are not recognized by the City or the State as scenic viewing locations. In addition, similar to the proposed project, development under the Reduced Residential Density Alternative would be subject to design review per Santa Rosa City Code (SRCC) Section 20-52.030, and would be required to comply with the General Plan 2035 Urban Design policies. Therefore, potential impacts to aesthetic resources under the Reduced Residential Density Alternative would be similar to the proposed project.

- **Air Quality:** Development under the proposed project would generate a substantial net increase in criteria air pollutant emissions that would exceed the Bay Area Air Quality Management District (BAAQMD) regional significance thresholds. Operational criteria air pollutant emissions would be generated from on-site area sources (e.g., landscaping fuel) and vehicle trips generated by the proposed project. Construction emissions associated with individual development projects under the proposed project would generate an increase in criteria air pollutants and Toxic Air Contaminants (TACs). Impacts associated with these effects were found to be significant and unavoidable at the programmatic level. Although the multi-family housing proposed under the Reduced Residential Density Alternative would be less intense when compared to the proposed project, it is likely that the operational and construction criteria air pollutant emissions would still generate a substantial net increase in criteria air pollutant emissions. However, because less residential development would occur under the Reduced Residential Density Alternative, impacts would be less than those of the proposed project.

- **Biological Resources:** As discussed in Chapter 4.3, Biological Resources, of this Draft EIR, development under the proposed project could impact special-status species, riparian habitat, wetlands and other waters, and wildlife movement opportunities or native nurseries in the Southeast Greenway Area; however, compliance with applicable federal, State, and local regulations as well as the proposed mitigation measures, would reduce potential impacts to a less-than-significant level. Similar to the proposed project, the Reduced Residential Density Alternative would be required to comply with the applicable regulations and proposed mitigation measures. Therefore, for these reasons and because the development footprint would similar to that of the proposed project, the impacts to biological resources under the Reduced Residential Density Alternative would be similar when compared to the proposed project.

- **Cultural and Tribal Cultural Resources:** Under the Reduced Residential Density Alternative, future development of public parks and recreational land uses including open space, multi-family
housing, and commercial uses in the Southeast Greenway Area would still occur, but would be slightly less intense than the proposed project. Similar to the proposed project, development under this alternative would involve ground-disturbing activities during construction of future structures which could affect unknown cultural and Tribal Cultural Resources. Consequently, future development under the Reduced Residential Density Alternative would be subject to existing federal, State, and local regulations laws to protect cultural resources, which would generally ensure less-than-significant impacts to cultural and Tribal Cultural Resources. In addition, the Reduced Residential Density Alternative would be required to comply with mitigation measures as recommended under the proposed project. Accordingly, potential impacts cultural and Tribal Cultural Resources under the Reduced Residential Density Alternative would be similar to the proposed project.

- **Geology and Soils:** The Reduced Residential Density Alternative would result in the development of public parks and recreational land uses including open space, multi-family housing, and commercial space on the project site. Similar to the proposed project, this alternative would result in the potential for damage to structures from soil/geologic conditions (i.e., seismicity and ground shaking; flooding; liquefaction, lateral spreading; geologic and soil instabilities; soil erosion/loss of topsoil; expansive and corrosive soils; and groundwater). Therefore, this alternative would result in similar impacts related to geology and soils.

- **Greenhouse Gas Emissions:** With respect to GHG emissions, the proposed project would not result in any significant GHG emissions impacts as it would not exceed the per capita significance threshold for GHG emissions, nor would the proposed project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG emissions, as described in Chapter 4.6, Greenhouse Gas Emissions, of this Draft EIR. Given that development under the Reduced Residential Density Alternative would result in a 50 percent reduction in multi-family housing, this alternative would result in less GHG emissions when compared to the proposed project. It is important to note that by reducing the infill residential units, this alternative does not realize the same GHG emissions reductions as the proposed project through placing housing near existing residential-serving land uses.

- **Hazards and Hazardous Materials:** As described in Chapter 4.7, Hazards and Hazardous Materials, the proposed project would be required to comply with existing federal, State, and local regulations related to the safe use, handling, disposal, transport, and generation of hazardous materials. In addition, there are no public airports or private airstrips within 2 miles of the project site. Similar to the proposed project, the Reduced Residential Density Alternative would be required to comply with the applicable laws, regulations, and conditions of approval, which would minimize potential impacts related to hazard and hazardous materials. Accordingly, impacts associated with hazard and hazardous materials would be similar when compared to the proposed project.

- **Hydrology and Water Quality:** Although the Reduced Residential Density Alternative would result in 50 percent less multi-family housing, this alternative would increase the amount of impervious surfaces on the project site similar to that of the proposed project. As such, the Reduced Residential Density Alternative would 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. Accordingly, impacts related to hydrology and water
quality under the Reduced Residential Density Alternative would be similar when compared to the proposed project.

- **Land Use and Planning:** Under the Reduced Residential Density Alternative the General Plan 2035 would be amended to allow for public parks and recreational land uses including open space, residential, and commercial land uses on the project site. Similar to the proposed project, the Reduced Residential Density Alternative would be required to comply with and further the objectives of applicable land use plans such as the General Plan 2035, Climate Action Plan, Plan Bay Area, the Bicycle and Pedestrian Master Plan, and the Citywide Creek Master Plan. Thus, impacts related to land use objectives would be similar under the Reduced Residential Density Alternative. It is important to note that this alternative does not contribute to meeting the City’s housing needs at the same level as the proposed project; however, because the site was not previously designated as land with potential housing potential, this is not considered to be an impact.

- **Noise:** Similar to the proposed project, development under the Reduced Residential Density Alternative would result in temporary and permanent increases to ambient noise levels. Accordingly, this alternative would be subject to General Plan 2035 policies, noise standards in the SRCC, and applicable best management practices described in Chapter 4.10, Noise, of this Draft EIR. Given that the level of development under Reduced Residential Density Alternative would less at the project site (i.e., 122 fewer residential units), noise related impacts under this alternative would be less when compared to the proposed project.

- **Population and Housing:** As discussed in Chapter 4.11, Population and Housing, the proposed project would not induce substantial unplanned growth, displace housing, or displace substantial numbers of people. Similar to the proposed project, the Reduced Residential Density Alternative would be required to comply with General Plan 2035 Housing policies which seek to provide adequate housing opportunities for all residents. Given, that the Reduced Residential Density Alternative would result in a 50 percent less residential development as the proposed project, impacts related to population and housing would be less when compared to the proposed project.

- **Public Services and Recreation:** As discussed in Chapter 4.12, Public Services, the proposed project would not require the expansion of police, fire, school, or library facilities. Because 50 percent fewer residents would be introduced to the project site as a result of this alternative, impacts to public services are assumed to be less when compared to the proposed project.

  With respect to recreational services, similar to the proposed project the Reduced Residential Density Alternative would contribute to the City’s adopted parkland ratio and the demand would be less with the addition of 50 percent fewer residents to Santa Rosa. Accordingly, the impacts would be less when compared to the proposed project.

- **Transportation and Circulation:** As discussed in Chapter 4.13, Transportation and Circulation, of this Draft EIR, impacts from new vehicular traffic would result in significant impacts at some intersections and corridors under Existing plus Project Conditions and Future plus Project. Because 122 fewer residential units would be introduced under this alternative, it is assumed that fewer residential vehicular trips would be generated when compared to the proposed project. Because the significant and unavoidable impacts under the proposed project would occur at the Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), which
currently operates unacceptably at LOS E during the PM peak hour, this condition would remain with or without additional trips under this alternative. The City’s ongoing plans to improve the Farmers Lane extension between Bennett Valley Road and Petaluma Hill Road that would change traffic patterns at the Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), resulting in more efficient operation, would continue under this alternative, eventually reducing the impact. Additionally, measures that could potentially reduce impacts to the Farmers Lane/Fourth Street-Sonoma Highway intersection (#1), would also be unachievable due to unknown funding sources. This condition would remain under this alternative as well. All recommended mitigation measures to improve pedestrian and bicycle facilities would occur under this alternative. While the number of vehicular trips would vary from that of the proposed project, because conditions at the conditions at the Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8) are currently unacceptable, the addition of vehicular trips under this alternative is assumed to have similar impacts when compared to the proposed project.

- **Utilities and Service Systems:** Under the Reduced Residential Density Alternative, development on the 57-acre project site would include public parks and recreational land uses including open space, multi-family housing, and commercial development. As such, this alternative would increase the demand for water supply, wastewater, solid waste, stormwater, and energy on the project site. However, given that the Reduced Residential Density Alternative results in 122 fewer units, the demand for services would be slightly less than the proposed project. Accordingly, overall impacts to utilities and service systems would be less when compared to the proposed project.

### 5.7.3 IMPACT SUMMARY

As described above, because 50 percent less residential development would occur as a result of selecting the Reduced Residential Density Alternative, impacts with respect to air quality, GHG emissions, noise, population and housing, public services and recreation, and utilities and service providers would be less than those of the proposed project.

Because the area of ground disturbance would be similar under both the Reduced Residential Density Alternative and the proposed project, impacts to aesthetics, biological resources, and unknown cultural and Tribal Cultural Resources would be similar to those of the proposed project.

Under the Reduced Residential Density Alternative, the potential for residential development would still occur on the site; therefore, geological and hazards and hazardous materials related to structures and residential development would be similar under both scenarios.

For land use and planning, future potential development under both scenarios would be required to comply with the existing regulations and plans for the City of Santa Rosa; thus, impacts would be similar to those of the proposed project.

With respect to transportation and circulation, both scenarios would generate trips that would impact the already impacted Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), which currently operates unacceptably at LOS E during the PM peak hour. Therefore, impacts were found to be similar to those of the proposed project.
5.7.4 RELATIONSHIP OF THE ALTERNATIVE TO THE PROJECT OBJECTIVES

The Reduced Residential Density Alternative would comply with the project objectives by providing a 47.2-acre linear park with open space, multi-family housing, commercial development, and multi-modal opportunities. The Reduced Residential Density Alternative would also provide opportunities for the enhancement and protection of biological resources on the project site. Therefore, this alternative would meet all of the project objectives, but not to the same degree with respect to providing housing to meet the City’s housing needs.

5.8 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 that would be expected to generate the least environmental impact. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets project objectives.

As shown in Table 5-2, the No Project Alternative would, in comparison to the project, result in fewer impacts when compared to those of the proposed project for all of the environmental impacts. It is important to note that with respect to biological resources (restore habitat), land use and planning (division of a community) and public services and recreation (adding new parkland), the No Project Alternative would not address these issues and improve conditions as would the proposed project. Regardless, because these do not necessarily result in a physical impact on the environment, the No Project Alternative is considered the environmentally superior alternative. However, in accordance with State CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

As shown on Table 5-2, the No Commercial/Residential Alternative would have less impacts related to air quality, aesthetics, biological resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services and recreation, and utilities and service system when compared to the proposed project. Accordingly, when compared to the proposed project, the No Commercial Development Alternative and the Reduced Residential Density Alternative, the No Commercial/Residential Alternative would be considered the environmentally superior alternative. However, because this alternative does not include residential or commercial development, it would meet some, but not all of the project objectives.
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