

## 5 ALTERNATIVES TO THE PROPOSED PROJECT

The Specific Plan has been described and analyzed in the previous sections to determine the potential impact of the Specific Plan on various environmental issues. The State CEQA Guidelines also require the description and comparative analysis of a range of reasonable alternatives to the proposed project that could feasibly attain the objectives of the project.

The following discussion is intended to inform the public and decision-makers of project alternatives that have been developed and the positive and negative aspects of those alternatives. In accordance with the CEQA Guidelines and procedures, three project alternatives, including the No Project Alternative are discussed below. CEQA Guidelines also require that the environmentally superior alternative be identified. This information is included at the end of this chapter. The three alternatives are:

- ◆ No Project Alternative (Existing General Plan Buildout)
- ◆ Reduced Growth Alternative
- ◆ Reallocated Growth Alternative

Table 5-1 summarizes the key features of each alternative, while Table 5-2 summarizes the result of analyzing each alternative against the environmental issues considered for the proposed Specific Plan, assessing whether it would have a mitigating or adverse effect.

During development of the Specific Plan, the planning process included the design of three alternatives, which are described in the *Downtown Station Area Specific Plan Land Use and Circulation Alternatives Report*. All of these alternatives assumed the same level of development, but changed the focus of where the development would occur. The alternatives included one that focused growth along Santa Rosa Creek, another that focused growth along Third Street, and the final alternative that focused growth along the SMART rail line. Based on input provided by the community on the three alternatives, the final preferred alternative was developed.

**CITY OF SANTA ROSA**  
**DOWNTOWN STATION AREA SPECIFIC PLAN EIR**  
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TABLE 5-1 **PROJECT ALTERNATIVES SUMMARY AT BUILDOUT**

<b>Alternative Features</b>	<b>Specific Plan</b>	<b>No Project Alternative</b>	<b>Reduced Growth Alternative</b>	<b>Reallocated Growth Alternative</b>
Residential Detached (units)	775	775	775	775
Residential Attached (units)	4,444	2,095	3,270	4,444
Senior Housing	76	76	76	76
Commercial/Retail (square feet)	2,430,000	2,422,856	2,430,000	2,430,000
Office (square feet)	1,350,000	1,711,959	1,350,000	1,350,000
Public/Institutional (square feet)	640,000	536,827	640,000	640,000
Heavy Industrial (square feet)	0	5,000	0	0
Light Industrial (square feet)	20,000	379,641	150,000	20,000

No off-site alternatives were identified during the Specific Plan development stage, nor are any included in this EIR since the Specific Plan is targeted towards development within Downtown Santa Rosa and along the SMART rail line. As a result, there are no other sites within the City that would be able to meet the objectives of the Specific Plan.

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TABLE 5-2 **COMPARISON OF PROJECT ALTERNATIVES**

<b>Impact Factor</b>	<b>No Project Alternative</b>	<b>Reduced Growth Alternative</b>	<b>Reallocated Growth Alternative</b>
Aesthetics	-	=	-
Air Quality	+	+	=
Biological Resources	=	=	=
Cultural Resources	=	=	=
Geology and Soils	=	=	=
Hazards and Hazardous Materials	-	-	=
Hydrology and Water Quality	=	+	-
Land Use	-	=	-
Noise	+	+	=
Population and Housing	+	=	-
Public Services and Recreation	+	+	=
Traffic and Circulation	-	=	-
Utilities and Infrastructure	+	+	=

- ++ Substantial improvement compared to the proposed project (avoids a significant and unavoidable impact)
- + Insubstantial improvement compared to the proposed project (improvement, but does not avoid a significant and unavoidable impact)
- = Same impact as proposed project.
- Insubstantial deterioration compared to the proposed project (deterioration, but does not create a new significant impact)
- Substantial deterioration compared to the proposed project (creates a new significant impact)

Note: Competing aspects within some factors would create both improvement and deterioration simultaneously for a single alternative. These trade-offs are discussed in the text.

### *A. No Project Alternative*

This section analyzes the No Project Alternative against the proposed Specific Plan.

#### **1. Principal Characteristics**

The No Project Alternative would result in the Specific Plan developing as currently allowed under the 2002 General Plan, as shown in Figure 4.8-1, in the Land Use section of this EIR. The major difference between the No Project Alternative and the Specific Plan is that there would be fewer attached units developed within the Specific Plan Area, especially within the Court-house Square, Railroad Square and Railroad Corridor Sub-Areas. In exchange, there would be more retail and office uses, and significantly more industrial uses developed. In addition, all of the Imwalle Gardens Sub-Area would be developed with residential uses. It is assumed that this alternative would be subject to all the mitigation measures identified in this EIR since they address environmental issues that would need to be addressed for most development occurring in the area.

#### **2. Impact Analysis**

This section describes the potential environmental impacts from the No Project Alternative for each of the environmental factors considered in Chapter 4 of this EIR.

##### **a. Aesthetics**

The Specific Plan would result in changes to the visual character of the Specific Plan Area that would be reduced to a less than significant level by policies contained in the Specific Plan and General Plan, and mitigation included in this EIR. The No Project Alternative would result in a similar change to the visual character of the area since it would result in the development of the entire Specific Plan Area. The No Project Alternative would also develop all of the Imwalle Gardens Sub-Area, which would remove the last remaining large open space area within the Specific Plan Area; however, this would not be considered a significant impact since there are limited views of the prop-

erty from most of the Specific Plan Area. In addition, the No Project Alternative would not be subject to the new Specific Plan design guidelines that would help improve the visual character of the existing urban downtown core area. As a result, the No Project Alternative would result in an insubstantially worse aesthetics impact than the Specific Plan.

b. Air Quality

The Specific Plan would result in significant and unavoidable impacts related to vehicular and operational emissions, especially ROG and PM<sub>10</sub>, which would exceed allowable thresholds. The No Project Alternative would result in fewer vehicular trips, which would reduce the amount of air pollutants generated, although this alternative would still generate substantial amounts of emissions. As a result, the No Project Alternative would result in an insubstantial improvement over the Specific Plan with regards to air quality impacts.

c. Biological Resources

The Specific Plan would have impacts on the Santa Rosa Creek, sensitive species, riparian vegetation and potential nesting and nursery. These impacts would be reduced to a less than significant level through mitigation contained in this EIR and existing policies and regulations. The No Project Alternative would have the same potential impact since it would result in the development of the entire Specific Plan Area. Development under the No Project Alternative would still need to comply with existing policies and regulations concerning the protection of biological resources. As a result, the No Project Alternative would have a similar biological impact as the Specific Plan.

d. Cultural Resources

The Specific Plan would have potential impacts on cultural resources that would be reduced to a less than significant level through mitigation contained in this EIR and existing policies and regulations. The No Project Alternative would have the same potential impact since it would result in the development of the entire Specific Plan Area. Development under the No Project Alternative would still need to comply with existing policies and regulations

concerning the preservation and protection of cultural resources. As a result, the No Project Alternative and the Specific Plan would have a similar impact on cultural resources.

e. Geology and Soils

The Specific Plan would have potential impacts related to seismic hazards, and erosive and expansive soils that would be reduced to a less than significant level through policies contained in the Specific Plan and existing policies and regulations. The No Project Alternative would have the same potential impact since it would result in the development of the entire Specific Plan Area, and while there would be a different mixture of urban development, it would still be within the same geographic area. Development under the No Project Alternative would still need to comply with existing policies and regulations concerning geologic hazards. As a result, the No Project Alternative and the Specific Plan would have a similar geologic and soils-related impact.

f. Hazards and Hazardous Materials

The Specific Plan would result in potential impacts related to an accidental release or discharge of hazardous materials, human or environmental exposure to contamination and interference with an emergency access or evacuation plan. These impacts would be reduced to a less than significant level through mitigation contained in this EIR and existing policies and regulations. The No Project Alternative would result in a greater risk related to hazards and hazardous materials than the Specific Plan since there would be a greater amount of industrial uses developed under this alternative and industrial uses generally utilize a higher volume of hazardous materials compared with residential uses. However, development under the No Project Alternative would still need to comply with existing policies and regulations. As a result, the No Project Alternative would have an insubstantially worse impact related to hazards and hazardous material than the Specific Plan.

g. Hydrology and Water Quality

The Specific Plan would have potential impacts related to groundwater, water quality and run-off, erosion and siltation, and flooding that would be reduced

to a less than significant level through policies contained in the Specific Plan and existing policies and regulations. The No Project Alternative would have similar potential impacts since it would result in the development of the entire Specific Plan Area, and while there would be a different mixture of urban development, it would still convert the majority of the Specific Plan Area into urban uses. In addition, under the No Project Alternative the entire Imwalle Gardens Sub-Area would develop, which would increase the amount of impervious surface. However, since the No Project Alternative would result in a 6.5 percent reduction in water demand, the No Project Alternative would have less of an impact to the groundwater aquifer. While the General Plan does not include all of the policies contained in the Specific Plan, development under the No Project Alternative would still need to comply with existing policies and regulations. As a result, the No Project Alternative would result in a similar impact since it would include development of the entire Imwalle Gardens Sub-Area, but would reduce the demand for groundwater.

h. Land Use

The Specific Plan would result in potential impacts related to consistency with adopted land use plans (i.e. the General Plan) and conversion of agricultural lands. However, these impacts would be reduced to a less than significant level through policies contained in the Specific Plan and since the Specific Plan is consistent with the intent of the adopted General Plan. The No Project Alternative would not require a General Plan Amendment since the No Project Alternative is the adopted General Plan. Under the No Project Alternative, the entire Imwalle Gardens Sub-Area would develop, which would result in the loss of more agricultural lands than under the Specific Plan. However, this would not result in a significant and unavoidable impact since the Imwalle Gardens Sub-Area is a small, agricultural operation completely surrounded by urban development. In addition, the land within the Imwalle Gardens Sub-Area not considered to be significant farmland with long term viability. As a result, the No Project Alternative would be considered insubstantially worse than the Specific Plan.

i. Noise

The Specific Plan would result in potential impacts related to construction, traffic and operational-related noise from new development, exposure of new development to noise from existing uses and the SMART rail line, and vibration from construction and railroad operation. These impacts would be reduced to a less than significant level through mitigation contained in this EIR and policies contained in the General Plan. The No Project Alternative would be subject to mitigation contained in this EIR to address the concerns of noise and vibration related to the SMART rail line. The No Project Alternative would have less of a potential impact related to vehicular noise since it would result in fewer vehicle trips, though it would not avoid a significant impact. As a result, the No Project Alternative would result in an insubstantial improvement related to noise compared to the Specific Plan.

j. Population and Housing

The Specific Plan would have potential impacts related potential growth inducement and displacement of people and housing units that would be reduced to a less than significant level through policies contained in the Specific Plan and General Plan. The No Project Alternative would result in fewer housing units and more employment opportunities than the Specific Plan, which would be consistent with the current growth projections for the Specific Plan Area. As a result, the No Project Alternative would result in an insubstantial improvement compared with the Specific Plan.

k. Public Services and Recreation

The Specific Plan would not create a demand for public facilities that could not be supported by already planned facility improvements, or by facilities identified in the Specific Plan. In addition, the Specific Plan identifies additional park and recreational opportunities to serve the increased population. The No Project Alternative would result in less of a potential impact since it would generate less of a demand for public services and recreational facilities. As a result, the No Project Alternative would result in an insubstantial improvement related to public services and recreation in comparison to the Specific Plan.

l. Traffic and Circulation

The Specific Plan would result in potential impacts related to increased vehicular trips and parking demand. In the case of the future operations of Highway 101, the Specific Plan would result in a significant, unavoidable impact to the roadway. The No Project Alternative would have less of a potential impact since it would result in approximately 5 to 7 percent fewer trips, though it would not avoid the significant impact to Highway 101. However, the No Project Alternative would result in fewer housing units, which would reduce the number of people that would choose to walk and bike within the Specific Plan Area. The No Project Alternative would also not include the various policies and design guidelines from the Specific Plan that would encourage alternative modes of transportation. As a result, the No Project Alternative would result in an insubstantially worse traffic related impact compared to the Specific Plan.

m. Utilities and Infrastructure

The Specific Plan would not create a demand for utilities that could not be supported by already planned facility improvements, by facilities identified in the Specific Plan, or through implementation of the policies contained in the Specific Plan. However, with fewer residential units, the No Project Alternative would result in less of a potential impact since it would generate less of a demand for most utilities. For example, at buildout, the No Project Alternative would result in approximately 6.5 percent less demand for water. The demand for stormwater drainage would be similar since the No Project Alternative would result in a similar amount of the Specific Plan Area being developed with impervious surfaces. As a result, the No Project Alternative would result in an insubstantial improvement related to utilities in comparison to the Specific Plan.

**3. Ability to Meet Project Objectives**

The No Project Alternative would not meet any of the project objectives since it would not result in any change to the City's current policy for the Specific Plan Area that would help focus development around the SMART transit station and downtown area.

#### **4. Reasons for Not Selecting This Alternative**

This alternative was not selected since it would not achieve any of the project objectives.

##### *B. Reduced Growth Alternative*

This section analyzes the Reduced Growth Alternative against the proposed Specific Plan.

#### **1. Principal Characteristics**

The Reduced Growth Alternative would decrease the amount of attached residential units that would be developed, to a mid-point between what would occur under the Specific Plan and under the No Project Alternative (existing General Plan). In addition, the amount of light industrial uses would be increased from the Specific Plan to replace some of the lost residential units; however, the amount of industrial uses would still be less than what would occur under the No Project Alternative. As a result, the majority of development change would occur within the Railroad Corridor and the Courthouse Square Sub-Areas. The portion of Imwalle Gardens that is designated for agricultural use in the Specific Plan would remain designated for agriculture. The goals, policies, and guidelines included in the Specific Plan would still apply, as would the mitigation measures included in this EIR.

#### **2. Impact Analysis**

This section describes the potential environmental impacts from the Reduced Growth Alternative for each of the environmental factors considered in Chapter 4 of this EIR.

##### **a. Aesthetics**

The Specific Plan would result in changes to the visual character of the Specific Plan Area that would be reduced to a less than significant level through policies contained in the Specific Plan and General Plan and mitigation contained in this EIR. The Reduced Growth Alternative would have the same

potential impact since it would result in similar types of development within the Specific Plan Area. The Reduced Growth Alternative would be subject to the same policies, regulations and mitigation as the Specific Plan. As a result, the Reduced Growth Alternative would have a similar aesthetics impact as the Specific Plan.

b. Air Quality

The Specific Plan would result in significant and unavoidable impacts related to vehicular and operational emissions, especially ROG and PM<sub>10</sub>, that would exceed allowable thresholds. The Reduced Growth Alternative would result in fewer vehicular trips, which would reduce the amount of air pollutants generated, although the alternative would still generate substantial amounts of emissions. As a result, the Reduced Growth Alternative would result in an insubstantial improvement over the Specific Plan with regards to air quality impacts.

c. Biological Resources

The Specific Plan would have impacts on the Santa Rosa Creek, sensitive species, riparian vegetation and potential nesting and nursery sites. The impacts would be reduced to a less than significant level through mitigation contained in this EIR and existing policies and regulations. The Reduced Growth Alternative would have the same potential impact since it would result in the development of the entire Specific Plan Area. The Reduced Growth Alternative would be subject to the same mitigation, policies and regulations as the Specific Plan. As a result, the Reduced Growth Alternative would have a similar biological impact as the Specific Plan.

d. Cultural Resources

The Specific Plan would have potential impacts on cultural resources that would be reduced to a less than significant level through mitigation contained in this EIR and existing policies and regulations. The Reduced Growth Alternative would have the same potential impact since it would result in the development of the entire Specific Plan Area. The Reduced Growth Alternative would be subject to the same mitigation, policies and regulations as the

Specific Plan. As a result, the Reduced Growth Alternative would have a similar cultural resources impact as the Specific Plan.

e. Geology and Soils

The Specific Plan would have potential impacts related to seismic hazards, and erosive and expansive soils that would be reduced to a less than significant level through mitigation contained in this EIR and existing policies and regulations. The Reduced Growth Alternative would have the same potential impact since it would result in the development of the entire Specific Plan Area, and while there would be a different mixture of urban development, it would still be within the same geographic area. The Reduced Growth Alternative would be subject to the same mitigation, policies and regulations as the Specific Plan. As a result, the Reduced Growth Alternative would have a similar geologic and soils-related impact as the Specific Plan.

f. Hazards and Hazardous Materials

The Specific Plan would result in potential impacts related to an accidental release or discharge of hazardous materials, human or environmental exposure to contamination and interference with an emergency access or evacuation plan that would be reduced to a less than significant level through mitigation contained in this EIR and existing policies and regulations. The Reduced Growth Alternative would result in a greater risk related to hazards and hazardous materials than the Specific Plan since there would be a greater amount of industrial uses developed under this alternative and industrial uses utilize a greater amount of hazardous materials compared with residential uses. However, development under the Reduced Growth Alternative would still need to comply with mitigation contained in this EIR, as well as existing policies and regulations. As a result, the Reduced Growth Alternative would have an in-substantially worse impact related to hazards and hazardous material than the Specific Plan.

g. Hydrology and Water Quality

The Specific Plan would have potential impacts related to groundwater, water quality and run-off, erosion and siltation, and flooding that would be reduced

to a less than significant level through policies contained in the Specific Plan and existing policies and regulations. The Reduced Growth Alternative would have a similar potential impact since it would result in the development of the entire Specific Plan Area, and while there would be a different mixture of urban development, it would still result in the majority of the Specific Plan Area developing into urban uses. However, since the Reduced Growth Alternative would result in a 5.7 percent reduction in water demand, the Reduced Growth Alternative would have less of an impact to the groundwater aquifer. As a result, the Reduced Growth Alternative would result in an insubstantial improvement related to hydrology and water quality.

h. Land Use

The Specific Plan would result in potential impacts related to consistency with adopted land use plans (i.e. the General Plan) and conversion of agricultural lands that would be reduced to a less than significant level through policies contained in the Specific Plan and since the Specific Plan is consistent with the intent of the adopted General Plan. The Reduced Growth Alternative would have a similar potential land use-related impact since it would result in the development of the entire Specific Plan Area with the same extent of development as the Specific Plan. As a result, the Reduced Growth Alternative would result in a similar land use impact.

i. Noise

The Specific Plan would result in potential impacts related to construction, traffic and operational-related noise from new development, exposure of new development to noise from existing uses and the SMART rail line, and vibration from construction and railroad operation that would be reduced to a less than significant level through policies contained in the Specific Plan and General Plan. The Reduced Growth Alternative would be subject to the same mitigation, policies and regulations as the Specific Plan. The Reduced Growth Alternative would have less of a potential impact since it would result in fewer vehicle trips, thereby reducing vehicular-generated noise; however, since the Specific Plan would not result in a significant impact related to vehicular noise, the Reduced Growth Alternative would not avoid a signifi-

cant impact. As a result, the Reduced Growth Alternative would result in an insubstantial improvement related to noise compared to the Specific Plan.

j. Population and Housing

The Specific Plan would have potential impacts related potential growth inducement and displacement of people and housing units that would be reduced to a less than significant level through policies contained in the Specific Plan and General Plan. The Reduced Growth Alternative would result in fewer housing units and more employment opportunities than the Specific Plan, which would be more consistent with the current growth projections for the Specific Plan Area. However, the alternative would result in development that did not work quite as well to meet some General Plan policies, especially those focusing on providing a range of affordable housing opportunities and housing within the downtown core. As a result, the Reduced Growth Alternative would balance out to be similar to the Specific Plan.

k. Public Services and Recreation

The Specific Plan would not create a demand for most public facilities that could not be supported by already planned facility improvements. In addition, the Specific Plan identifies additional park and recreational opportunities to serve the increased population. The Reduced Growth Alternative would have a similar potential impact since it would generate less of a demand for public services and recreational facilities, so would not exceed the capacity already planned. The Reduced Growth Alternative would have less of a potential impact since it would generate less of a demand for public services and recreational facilities. As a result, the Reduced Growth Alternative would result in an insubstantially improvement related to public services and recreation than the Specific Plan.

l. Traffic and Circulation

The Specific Plan would result in potential impacts related to increased vehicular trips and parking demand. In the case of the future operations of Highway 101, the Specific Plan would result in a significant, unavoidable impact to the roadway. The Reduced Growth Alternative would have less of an

potential impact since it would result in approximately 4 to 6 percent fewer trips, though it would not avoid the significant impact to Highway 101. However, the Reduced Growth Alternative would result in fewer housing units, which would reduce the number of people that would choose to walk and bike around the Specific Plan Area. As a result, the Reduced Growth Alternative would result in a similar traffic related impact as the Specific Plan.

m. Utilities and Infrastructure

The Specific Plan would not create a demand for utilities that could not be supported by already planned facility improvements, by facilities identified in the Specific Plan, or through implementation of the policies contained in the Specific Plan. However, with fewer residential units, the Reduced Growth Alternative would result in less of a potential impact since it would generate less of a demand for most utilities. For example, at buildout, the Reduced Growth Alternative would result in approximately 5.7 percent less demand for water. The demand for stormwater drainage would be similar since the Reduced Growth Alternative would result in a similar amount of the Specific Plan Area being developed with impervious surfaces. As a result, the Reduced Growth Alternative would result in an insubstantial improvement related to utilities in comparison to the Specific Plan.

**3. Ability to Meet Project Objectives**

The Reduced Growth Alternative would reduce some of the impacts related to the Specific Plan and meets the project objectives since it would increase the density of residential uses around the SMART station and it would contain the Specific Plan policies and guidelines. However, it would not go as far as the Specific Plan to achieve the project objectives of creating an environment that supports successful transit and alternative modes of transportation since it would not create the density associated with transit-conducive downtown cores.

**4. Reasons for Not Selecting This Alternative**

While this alternative does achieve the project objectives, it would not be as successful as the Specific Plan for the above reasons. As a result, since this

alternative does not avoid any significant impacts associated with the Specific Plan, it would not make sense to adopt an alternative that was less successful than the Specific Plan.

### *C. Reallocated Growth Alternative*

This section analyzes the Reallocated Growth Alternative against the proposed Specific Plan.

#### **1. Principal Characteristics**

The Reallocated Growth Alternative would result in the same level of development anticipated under the Specific Plan, but would address some concerns from the community about new development adjacent to existing residential communities. In order to minimize the amount of density increases adjacent to the Residential Historic Sub-Areas, some of the attached residential units along the edges of the Railroad Corridor, Railroad Square and Courthouse Square Sub-Areas would be reallocated to the Imwalle Gardens site and the agricultural designation would be deleted. The Specific Plan would also be designed to focus more of the residential units into the core of the Courthouse Square Sub-Area. The goals, policies, and guidelines included in the Specific Plan would still apply, as would the mitigation measures included in this EIR.

#### **2. Impact Analysis**

This section describes the potential environmental impacts from the Reallocated Growth Alternative for each of the environmental factors considered in Chapter 4 of this EIR.

##### **a. Aesthetics**

The Specific Plan would result in changes to the visual character of the Specific Plan Area that would be reduced to a less than significant level through policies contained in the Specific Plan and General Plan and mitigation included in this EIR. The Reallocated Growth Alternative would have a similar

potential impact since it would result in similar types of development within the Specific Plan Area. However, the Reduced Growth Alternative would also develop all of the Imwalle Gardens Sub-Area, which would remove the last remaining large open space area within the Specific Plan Area, though it would not be considered a significant impact since there are limited views of the property from most of the Specific Plan Area. The Reduced Growth Alternative would be subject to the same policies, regulations and mitigation as the Specific Plan. As a result, the Reduced Growth Alternative would result in an insubstantially degraded aesthetics impact compared with the Specific Plan.

b. Air Quality

The Specific Plan would result in significant and unavoidable impacts related to vehicular and operational emissions, especially ROG and PM<sub>10</sub>, that would exceed allowable thresholds. The Reallocated Growth Alternative would result in similar vehicular trips, and therefore, a similar level of emissions of air pollutants. As a result, the Reallocated Growth Alternative would result in a similar air quality impact as the Specific Plan.

c. Biological Resources

The Specific Plan would have impacts on Santa Rosa Creek, sensitive species, riparian vegetation and potential nesting and nursery sites that would be reduced to a less than significant level through mitigation contained in this EIR and existing policies and regulations. The Reallocated Growth Alternative would have the same potential impact since it would result in the development of the entire Specific Plan Area. The Reallocated Growth Alternative would be subject to the same mitigation, policies and regulations as the Specific Plan. As a result, the Reallocated Growth Alternative would have a similar biological impact as the Specific Plan.

d. Cultural Resources

The Specific Plan would have potential impacts on cultural resources that would be reduced to a less than significant level through mitigation contained in this EIR and existing policies and regulations. The Reallocated Growth

Alternative would have the same potential impact since it would result in the development of the entire Specific Plan Area. The Reallocated Growth Alternative would be subject to the same mitigation, policies and regulations as the Specific Plan. As a result, the Reallocated Growth Alternative would have a similar cultural resources impact as the Specific Plan.

e. Geology and Soils

The Specific Plan would have potential impacts related to seismic hazards, and erosive and expansive soils that would be reduced to a less than significant level through mitigation contained in this EIR and existing policies and regulations. The Reallocated Growth Alternative would have the same potential impact since it would result in the development of the entire Specific Plan Area. While there would be a different organization of urban development, it would still be within the same geographic area. The Reallocated Growth Alternative would be subject to the same mitigation, policies and regulations as the Specific Plan. As a result, the Reallocated Growth Alternative would have a similar geologic and soils-related impact as the Specific Plan.

f. Hazards and Hazardous Materials

The Specific Plan would result in potential impacts related to an accidental release or discharge of hazardous materials, human or environmental exposure to contamination and interference with an emergency access or evacuation plan that would be reduced to a less than significant level through mitigation contained in this EIR and existing policies and regulations. The Reallocated Growth Alternative would have the same potential impact since it would result in the same type and amount of development as the Specific Plan Area within the same geographic area. The Reallocated Growth Alternative would be subject to the same mitigation, policies and regulations as the Specific Plan. As a result, the Reallocated Growth Alternative would have a similar impact related to hazards and hazardous materials as the Specific Plan.

g. Hydrology and Water Quality

The Specific Plan would have potential impacts related to groundwater, water quality and run-off, erosion and siltation, and flooding that would be reduced

to a less than significant level through policies contained in the Specific Plan and existing policies and regulations. The Reallocated Growth Alternative would have a similar potential impact since it would result in the development of the entire Specific Plan Area with the same amount of development as the Specific Plan and would generate the same demand for water. In addition, under the Reallocated Growth Alternative the entire Imwalle Gardens Sub-Area would develop, which would increase the amount of impervious surface. As a result, the Reallocated Growth Alternative would result in an insubstantially worse impact since it would include development of the entire Imwalle Gardens Sub-Area.

h. Land Use

The Specific Plan would result in potential impacts related to consistency with the 2002 General Plan and conversion of agricultural lands that would be reduced to a less than significant level through policies contained in the Specific Plan and since the Specific Plan is consistent with the intent of the adopted General Plan. The Reallocated Growth Alternative would have a similar potential land use-related impact since it would result in the development of the entire Specific Plan Area with the same amount of development as the Specific Plan. However, under the Reallocated Growth Alternative, the entire Imwalle Gardens Sub-Area would develop, which would result in loss of more agricultural lands than under the Specific Plan. However, this would not result in a significant, unavoidable impact since the Imwalle Gardens Sub-Area is a small, agricultural operation completely surrounded by urban development, and is not considered to be significant farmland with long-term viability. As a result, the Reallocated Growth Alternative would be considered insubstantially worse than the Specific Plan.

i. Noise

The Specific Plan would result in potential impacts related to construction, traffic and operational-related noise from new development, exposure of new development to noise from existing uses and the SMART rail line, and vibration from construction and railroad operation that would be reduced to a less than significant level through mitigation contained in this EIR and General

Plan policies. The Reallocated Growth Alternative would have the same potential impact since it would result in the same type and amount of development as the Specific Plan Area within the same geographic area. The Reallocated Growth Alternative would be subject to the same mitigation, policies and regulations as the Specific Plan. As a result, the Reallocated Growth Alternative would have a similar impact related to noise as the Specific Plan.

j. Population and Housing

The Specific Plan would have potential impacts related to potential growth inducement and displacement of people and housing units that would be reduced to a less than significant level through policies contained in the Specific Plan and General Plan. The Reallocated Growth Alternative would have a similar potential impact since it would result in the development of the entire Specific Plan Area, and while there would be a different organization of urban development, it would still result in a similar mix of development. However, since the Reallocated Growth Alternative would be somewhat less centralized than the Specific Plan, the alternative would result in development that would not achieve some General Plan policies as well as the Specific Plan. As a result, the Reallocated Growth Alternative would be considered substantially worse than the Specific Plan.

k. Public Services and Recreation

The Specific Plan would not create a demand for most public facilities that could not be supported by already planned facility improvements. In addition, the Specific Plan identifies additional park and recreational opportunities to serve the increased population. The Reallocated Growth Alternative would have the same potential impact since it would result in the same amount of development and generate the same demand for public services and recreational facilities. The Reallocated Growth Alternative would be subject to the same policies and regulations as the Specific Plan. As a result, the Reallocated Growth Alternative would have a similar impact related to public services and recreation as the Specific Plan.

1. Traffic and Circulation

The Specific Plan would result in potential impacts related to increased vehicular trips and parking demand. In the case of the future operations of Highway 101, the Specific Plan would result in a significant, unavoidable impact to the roadway. The Reallocated Growth Alternative would have the same potential impact since it would result in the same type and amount of development as the Specific Plan Area within the same geographic area. In addition, the Reallocated Growth Alternative would be subject to the same policies and regulations as the Specific Plan. However, the Reallocated Growth Alternative would spread development out further, which would reduce some of the incentives for people to walk and bicycle around the Specific Plan Area. As a result, the Reallocated Growth Alternative would have an insubstantially worse impact related to traffic than the Specific Plan.

m. Utilities and Infrastructure

The Specific Plan would not create a demand for utilities that could not be supported by already planned facility improvements, by facilities identified in the Specific Plan, or through implementation of the policies contained in the Specific Plan. The Reallocated Growth Alternative would result in the same potential impact since it would generate the same demand for utilities as it will result in the same amount of development. As a result, the Reallocated Growth Alternative would result in the same impact related to utilities in comparison to the Specific Plan.

**3. Ability to Meet Project Objectives**

The Reallocated Growth Alternative would meet all of the project objectives. However, it would not be as successful as the Specific Plan in achieving the project objectives to create an environment that supports the success of transit and alternative modes of transportation since it would distribute residential density further away from the downtown core and SMART station.

**4. Reasons for Not Selecting This Alternative**

While this alternative does achieve the project objectives, it would not be as successful as the Specific Plan for the above reasons. As a result, since this

alternative does not avoid any significant impacts associated with the Specific Plan, it would not make sense to adopt an alternative that was less successful than the Specific Plan.

*D. Environmentally-Superior Alternative*

CEQA Guidelines require that the environmentally-superior alternative be designated. If the alternative with the least environmental impact is the No Project Alternative, then this document must also designate the next most environmentally-preferable alternative. In this case, the Reduced Growth Alternative would be the preferable alternative when considering all of the various aspects.