

5.0 ALTERNATIVES

In accordance with the California Environmental Quality Act (CEQA) and Section 15126.6 of the *State CEQA Guidelines*, an Environmental Impact Report (EIR) must describe a reasonable range of alternatives to the project, or to the location of the project, that could attain most of the project's basic objectives, while avoiding or substantially lessening any of the significantly adverse environmental effects of the project. An EIR does not need to 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.

As an EIR identifies ways to mitigate or avoid significant effects that a project may have on the environment, the discussion of alternatives should focus on alternatives to the project or its location that are capable of avoiding or substantially lessening significant effects of the project. The EIR needs to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project, the significant effects of the alternative should be discussed, but in less detail than the significant effects of the project. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. CEQA states that an EIR should not consider alternatives "whose effect cannot be ascertained and whose implementation is remote and speculative" or which are infeasible.

As described in more detail in Chapter 3.0, Project Description, the proposed project would involve redevelopment of the existing mall through demolition, renovation, and new construction with a mix of commercial and residential land uses. The proposed project would be developed in two phases. Phase 1 (also referred to as the 2025 Master Plan) would generally include the demolition of the RH Outlet building, the HomeGoods building, and Mall Shops East, which is approximately 144,432 square feet of the main building, and construction of approximately 44,380 square feet of new commercial space and up to 922 residential units. Phase 2 (also referred to as the 2040 Vision Plan) would generally include the demolition of the 254,015-square-foot Macy's building and 79,051-square-foot Kohl's building, and the construction of up to 55,440 square feet of new commercial space and up to 500 additional residential units.

At full buildout, the project would include a total of up to approximately 217,520 square feet of commercial space and up to 1,422 residential units in six areas of the project site (1,746,936 square feet of residential area), 147 of which would be affordable units. A total of 648,807 square feet of existing building space would be demolished, and the total commercial area would be reduced by a total of 548,987 square feet. Building heights across the project site would vary, with a maximum of approximately 78 feet. The first phase of the proposed project would include the construction of a Town Square near the center of the project site. Additional common open space and landscaped areas would be provided in both the first and second phases. New internal roadways would be built within the project site that would provide access to each of the new buildings and surface parking lots.

Discretionary actions by the City of San Rafael (City) that would be necessary for development of the proposed project include environmental review, rezoning, an Environmental and Design Review Permit, a Development Agreement, a tentative subdivision map, and a Master Sign Program. The project sponsor is also requesting to use the density bonus to modify the development standards for height on the project site.

As provided by the project sponsor, the objectives of the proposed project are to:

- Implement the San Rafael General Plan 2040 vision for mixed use, transit-oriented development, and high-density housing on the project site;
- Implement the City's and regional agencies' designation of the project site as a Priority Development Area (i.e., a place with convenient public transit service that is prioritized by local government for housing, jobs, and services);
- Redevelop the existing mall facility into a town center with a relevant mix of commercial and retail offerings to support the local economy and provide tax revenues and employment opportunities;
- Create new housing offerings to meet the needs of families of varying sizes and reduce the recognized regional and local deficit of housing;
- Create a town center/urban village through a combination of retail, dining, and residential uses within a pedestrian-oriented urban core; and
- Provide new outdoor amenities and open spaces, main street improvements, and recreational opportunities interconnected by pedestrian links throughout the project.

The potential environmental effects of implementing the proposed project are analyzed in Chapter 4.0, Setting, Impacts, and Mitigation Measures. Table 5.A, located at the end of this chapter, summarizes the impacts of the proposed project. The proposed project has been described and analyzed in the previous chapter of this EIR, with an emphasis on evaluating significant impacts resulting from the project and identifying mitigation measures to avoid or reduce these impacts to a less than significant level.

The three alternatives to the proposed project that are discussed and evaluated in this chapter are the following:

- **No Project Alternative:** Under the No Project Alternative, the project site would continue to be occupied by the existing Northgate Mall. The existing mall includes the main mall building, which is a total of approximately 633,783 square feet in size, and consists of five sections: (1) Mall Shops East, (2) Mall Shops West, (3) Century Theatre, (4) RH Outlet, and (5) Macy's. West of the main building is a Kohl's department store, which also includes a small attached unoccupied retail space, a two-level parking structure containing approximately 476 parking spaces, and a vacant retail building. A Rite Aid, HomeGoods, and an additional vacant retail building are located east of the main building. A total of approximately 2,190 people could be employed on

the project site at full occupancy, though this would continue to fluctuate based on market conditions.

- **Reduced Development Alternative:** Under the Reduced Development Alternative, only Phase 1 (also referred to as the 2025 Master Plan) of the proposed project would be implemented. Phase 1 would consist of the demolition of the two vacant retail buildings (Sears Auto Center and Sears Seasonal) totaling 28,500 square feet on the southern portion of the project site. Phase 1 of the proposed project also would include demolition of the RH Outlet building, the HomeGoods building, and Mall Shops East, which is approximately 144,432 square feet of the main building. A total of 44,380 square feet of new commercial space would also be constructed, resulting in a total of 501,941 square feet of commercial space. Phase 1 would include the construction of a total of 922 residential units within three apartment-style residential buildings (containing 822 units) and 15 townhome buildings (containing 100 units), all located on a fourth parcel, resulting in a residential population of 2,295. At least 10.4 percent of the 922 dwelling units constructed would be below market rate units set aside for low-income households (minimum of 96 dwelling units). It is estimated that Phase 1 would result in a reduction in employees from approximately 2,190 to 1,434.
- **Reduced Residential Alternative:** Under the Reduced Residential Alternative, the total number of residential units would decrease by 63 units compared to the proposed project, for a total of 1,359 units at buildout and a resulting residential population of 3,384. The reduction in the number of units would occur during implementation of Phase 1, with development of 859 residential units. Specifically, Residential 1 would be developed with 33 townhomes units (63 fewer units and a different unit mix than the apartments proposed by the project), Residential 2 would be developed with 100 townhome units, Residential 3 would be developed with 280 apartment units, and Residential 4 would be developed with 446 apartment units. With the exception of the reduction in residential unit count and mix, all other elements of the Phase 1 2025 Master Plan and Phase 2 2040 Vision Plan proposed by the project would occur. At full buildout, the Reduced Residential Alternative would include a total of up to approximately 217,520 square feet of commercial space and up to 1,359 residential units, including 136 below market rate units set aside for low-income households. The below market rate units would be constructed throughout the project site and in compliance with Section 14.16.030 of the San Rafael Municipal Code.

These alternatives represent a reasonable range of potential alternatives to the proposed project in light of the objective of avoiding or reducing the severity of significant and unavoidable impacts and/or impacts identified as less than significant with mitigation, as discussed in Chapter 4.0 of this EIR. A few other potential alternatives were also considered, as discussed later in this chapter; however, none of these alternatives would substantially reduce or avoid the environmental impacts of the proposed project and/or would not meet many of the basic project objectives and were therefore ultimately not selected for further analysis.

The purpose of this discussion of alternatives to the proposed project is to enable decision-makers and the public to evaluate the project by considering how alternatives to the project as proposed might reduce or avoid the project's impacts on the physical environment. The analysis in this

chapter provides a qualitative evaluation of the environmental impacts that could be associated with each alternative and compares those potential impacts to those identified for the proposed project as described in Chapter 4.0, Setting, Impacts, and Mitigation Measures of this EIR. The analysis focuses on the topics addressed in Chapter 4.0. Topics not addressed in Chapter 4.0 but that were determined to have no impacts or less than significant impacts in Chapter 6.0, Other CEQA Considerations, include: agricultural and forestry resources, biological resources, mineral resources, and wildfire. These topics are not further addressed in this chapter.

5.1 NO PROJECT ALTERNATIVE

The following provides a description of the No Project Alternative and its anticipated environmental impacts. The emphasis of the analysis is on comparing the anticipated environmental impacts of the No Project Alternative to the environmental impacts associated with the proposed project. The discussion includes a determination of whether or not the No Project Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed project.

5.1.1 Principal Characteristics

The No Project Alternative assumes that the proposed project would not be developed and that the project site would generally remain in its current condition. The project site would continue to be occupied by the Northgate Mall, including the main mall building, surrounding surface parking, and standalone buildings and structures. The existing mall is generally oriented on a north-south axis, with the main building located in the center of the project site surrounded by surface parking and standalone buildings and structures. The main mall building, which is a total of approximately 633,783 square feet in size, consists of five sections: (1) Mall Shops East, (2) Mall Shops West, (3) Century Theatre, (4) RH Outlet,¹ and (5) Macy's. West of the main building is a Kohl's department store, which also includes a small attached unoccupied retail space, a two-level parking structure containing approximately 476 parking spaces, and a vacant retail building. A Rite Aid, HomeGoods, and an additional vacant retail building are located east of the main building. An approximately 200-square-foot substation for the San Rafael Police Department (SRPD) is also currently located within the main mall building. All of these existing uses and facilities would continue to operate at the site, although occupancy would likely continue to fluctuate based on market demands.

5.1.2 Analysis of the No Project Alternative

The potential impacts associated with the No Project Alternative are described below. As discussed, the No Project Alternative would avoid all of the construction-related impacts of the proposed project. Full occupancy of the Northgate Mall with commercial uses would result in more vehicle trips compared to operation of the proposed project, with resulting air pollutant and greenhouse gas (GHG) emissions. No mitigation measures would be required for the No Project Alternative. The No Project Alternative would not achieve any of the objectives of the proposed project.

¹ The RH Outlet building was formerly known as the Sears anchor; certain project application materials refer to the building this way.

5.1.2.1 Land Use and Planning

Implementation of the No Project alternative would result in the continuation of existing conditions on the project site. Therefore, like the proposed project, the No Project alternative would not result in the physical division of an established community. Unlike the proposed project, the No Project alternative would fail to implement provisions of the City's General Plan 2040 and Plan Bay Area 2050 calling for mixed uses on the project site. These are plans, policies, and ordinances adopted for the purposes of avoiding or mitigating an environmental effect, but continuation of existing conditions would not represent a legal conflict with those plans and policies for purposes of CEQA. Therefore, the No Project alternative would have a **less than significant** impact related to land use and planning.

5.1.2.2 Population and Housing

Implementation of the No Project Alternative would result in the continuation of existing conditions on the project site. Therefore, the No Project Alternative would not result in substantial direct or indirect population growth beyond that planned for the city, county, or region, and would not result in the displacement of housing or people necessitating the construction elsewhere. Therefore, compared to the less than significant impacts of the proposed project, the No Project Alternative would have **no impact** related to population and housing. However, it should be noted that implementation of the No Project Alternative would not result in any of the housing benefits provided by the proposed project because the existing conditions at the site would not contribute to the needed and planned for supply of housing in San Rafael, including affordable housing.

5.1.2.3 Visual Resources

Implementation of the No Project Alternative would not result in any demolition activities or new construction on the project site, and therefore would not introduce any new buildings or structures that could have substantial adverse effects on scenic vistas or resources within view of a scenic highway, conflict with applicable regulations governing scenic quality, or create any new light or glare, or cast new shadows onto public open spaces. Therefore, compared to the less than significant impacts of the proposed project, there would be **no impact** related to aesthetics.

5.1.2.4 Cultural Resources

Implementation of the No Project Alternative would not result in any demolition or ground-disturbance activities or include any new construction. Similar to the proposed project, the No Project alternative would not cause a substantial adverse change in the significance of a historical resources or disturb any human remains and these less than significant project impacts would result in no impact under the No Project alternative. In addition, since there would be no ground disturbance, implementation Mitigation Measures CUL-1a through CUL-1c, which are required for the proposed project, would not be required to reduce potentially significant impacts to archaeological resources during the construction period to a less than significant level. Therefore, compared to the less than significant impacts of the proposed project, the No Project alternative would have **no impact** related to cultural resources.

5.1.2.5 Tribal Cultural Resources

Implementation of the No Project alternative would not result in any ground disturbance and would result in the continuation of existing conditions on the project site. Therefore, since there would be no ground disturbance, implementation Mitigation Measures TCR-1a through TCR-1b, which are required for the proposed project, would not be required to reduce potentially significant impacts to tribal cultural resources during the construction period a less than significant level. the No Project alternative would not disturb damage, or degrade any tribal cultural resources. Therefore, compared to the less than significant impacts of the proposed project, the No Project alternative would have **no impact** related to tribal cultural resources.

5.1.2.6 Geology and Soils

Implementation of the No Project Alternative would not result in any demolition or ground-disturbance activities or include any new construction. Therefore, the No Project alternative would not result in any impacts associated with fault rupture or other seismic events. Since there would be no ground disturbance or new construction, implementation of Mitigation Measures GEO-1 and GEO-2, which are required for the proposed project, would not be required to reduce potentially significant impacts related to expansive soils and unstable soils subject to subsidence, settlement, or differential settlement to a less than significant level. In addition, because no ground disturbance would occur, implementation of the No Project Alternative would not potentially destroy or substantially damage a unique paleontological resource or geologic feature, and proposed project Mitigation Measure GEO-3 would also not be required. Therefore, compared to the less than significant impacts of the proposed project, the No Project Alternative would have **no impact** related to geology and soils. However, it should also be noted that implementation of the No Project alternative would not result in the redevelopment of the site and construction of buildings that would meet the most recently adopted California Building Code seismic standards because the mall has not been renovated since 2008.²

5.1.2.7 Hydrology and Water Quality

Implementation of the No Project Alternative would not result in any ground-disturbance activities, changes to impervious surface conditions, or new construction on the project site. Therefore, the No Project Alternative would not result in any impacts associated with construction period water quality standards, and implementation of Mitigation Measure HYD-1, which is required for the proposed project, would not be required to reduce potentially significant construction-period impacts related to dewatering activities and the potential for groundwater contaminants to enter the project site to a less than significant level. Similarly, Mitigation Measure HYD-2 would not be required to ensure that interference with the sustainable management of groundwater in the Santa Rosa Plain Subbasin does not occur and Mitigation Measure HYD-3 would not be required to ensure that the capacity of proposed stormwater infrastructure is not exceeded, resulting in potential on- and off-site flooding. The less than significant project impacts related to operation period water

² The mall originally opened in 1965. In 1987, the site underwent a major renovation that primarily enclosed the original open-air design and underwent additional renovations in 2008 in which the owner at the time proposed to demolish a portion of the central mall building and make various exterior improvements.

quality standards, alteration of pervious surfaces, erosion and siltation, and potential release of pollutants due to project inundation due to flooding or dam failure also would not occur. Therefore, compared to the less than significant impacts of the proposed project, the No Project Alternative would have **no impact** related to hydrology and water quality. However, it should also be noted that implementation of the No Project alternative would not result in the reduction of impervious surface and addition of stormwater treatment that the proposed project would provide.

5.1.2.8 Hazards and Hazardous Materials

Implementation of the No Project Alternative would not result in any demolition or ground-disturbance activities or include any new construction. Therefore, the No Project Alternative would not result in any impacts associated with the potential release of contaminants into the environment as a result of demolition and renovation activities and implementation of Mitigation Measure HAZ-1, which is required for the proposed project, would not be required to reduce potentially significant construction-period impacts associated with hazardous building materials to a less than significant level. Similarly, Mitigation Measure HAZ-2 would not be required to control the risk of releasing hazardous materials into the environment during project construction and operation due to existing subsurface soil contamination at the site. In addition, the following would not occur: significant project impacts related to the routine transport, use, disposal, and management of hazardous materials during construction and operation; accidental release of hazardous materials due to spills, leaks, or improper disposal of such materials; hazardous emissions within proximity to schools; listing on databases compiled for the purposes of documenting hazardous materials sites; and aviation hazards. Additionally, no modifications to existing site access or infrastructure would occur, thus no impacts related to emergency evacuation plans would occur. Therefore, compared to the less than significant impacts of the proposed project, the No Project Alternative would have **no impact** related to hazards and hazardous materials.

5.1.2.9 Transportation

Implementation of the No Project Alternative would not result in any changes to site circulation or access and automobile, transit, bicycle, or pedestrian travel to and from the project site would be the same as the existing condition. Therefore, compared to the less than significant impacts of the proposed project, there would be **no impact** related to conflicts with applicable transportation-related plans, policies and ordinances; vehicle miles traveled (VMT); design hazards; and emergency access. It should also be noted that implementation of the No Project Alternative would not result in the overall reduction of vehicle trips to and from the site, compared to the proposed project. As discussed in Section 4.8, Transportation, the existing mall use generates approximately 24,324 daily vehicle trips to and from the project site, including 565 trips in the AM peak hour and 2,079 trips in the PM peak hour.³ Implementation of the proposed project would result in a net reduction of 3,585 daily vehicle trips to and from the project site, including 345 fewer trips during the PM peak hour. Implementation of the proposed project would, however, increase the number of AM peak-hour trips by 172 trips.

³ W-Trans. 2023. *Transportation Impact Study for the Northgate Town Square Project*. February 14.

5.1.2.10 Air Quality

Implementation of the No Project Alternative would not result in any demolition or ground-disturbance activities or include any new construction. Therefore, the No Project Alternative would not result in any impacts associated with construction period emissions (including fugitive dust and ozone precursors) and implementation of Mitigation Measures AIR-2 and AIR-3, which are required for the proposed project (Mitigation Measure AIR-3 is required for Phase 1 only), would not be required to reduce potentially significant construction-period impacts to a less than significant level. Similarly, Mitigation Measure AIR-4 would not be required to reduce the exposure of sensitive receptors to substantial pollutant concentrations during the construction period. Also compared to the less than significant project impacts related to operation period emissions, including criteria air pollutants, exposure of sensitive receptors to pollutant concentrations and other emissions such as odors, and associated conflicts with the Clean Air Plan, there would be **no impact** under the No Project Alternative. It should also be noted, similar to the discussion above in Section 5.1.2.9, mobile source emissions would be reduced with the proposed project, compared to existing conditions; therefore, these emission reductions would not be realized under the No Project Alternative.

5.1.2.11 Greenhouse Gas Emissions

Implementation of the No Project Alternative would not result in any demolition activities or include any new construction. Therefore, compared to the less than significant impacts of the proposed project, the No Project Alternative would not result in any impacts associated with construction period GHG emissions. Operation-period emissions associated with the proposed project also would not occur, and there would be no conflict with the Bay Area Air Quality Management District's (BAAQMD) GHG reduction measures. Specifically, no new construction or uses would be established that would use natural gas; therefore, implementation of Mitigation Measures GHG-1 would not be required, and the significant unavoidable impacts associated with the generation of GHG emissions would not occur. Similarly, conflicts with policies and plans implemented for the purposes of reducing GHG emissions also would not occur. Therefore, compared to the significant and unavoidable impacts of the proposed project, the No Project Alternative would have **no impact** related to GHG emissions. However, it should be noted that the use of natural gas and associated GHG emissions would be lower with the proposed project than with the No Project Alternative, which would retain all existing retail/restaurant square footage with existing natural gas connections that are used for space heating as well as commercial kitchens.

In addition, it should be noted that implementation of the No Project Alternative would also not result in the reduction of operational GHG emissions provided by the proposed project due to the reduction in daily vehicle trips to and from the project site. As discussed in Section 4.8, Transportation, implementation of the proposed project would result in a net reduction of 3,585 daily vehicle trips to and from the project site. This reduction in daily vehicle trips would decrease the amount of GHGs emitted during operational vehicle trips to and from the project site and reduce the GHG emissions associated with uses at the project site.

5.1.2.12 Noise

Implementation of the No Project Alternative would not result in any construction activities on the site or introduction of a new mix of uses to the site, including noise-sensitive residential uses.

Therefore, compared to the less than significant impacts of the proposed project, there would be no impact related to exposure of off-site sensitive receptors to operation-period noise or increases in roadway traffic noise in excess of established standards during project operation. Similar to the proposed project, there also would be no impact related to aircraft-related noise. Given that there would be no construction activities on the site, short-term increases in ambient noise levels would not occur and implementation of Mitigation Measure NOI-1, requiring the installation of construction-period sound barriers, would not be required to reduce exposure of noise sensitive land uses to construction noise. Because no new sensitive receptors would be introduced to the site, the significant and unavoidable impact to on-site residential land uses would not occur and Mitigation Measure NOI-2 would not be required. Compared to the less than significant and significant and unavoidable impacts of the proposed project, the No Project Alternative would have **no impact** related to noise.

5.1.2.13 Public Services and Recreation

Implementation of the No Project Alternative would result in the continuation of existing conditions on the project site. Therefore, the No Project Alternative would not result in the need for additional fire or police staffing or services, or the need for any new or physically altered governmental facilities, including parks and recreational facilities. Compared to the less than significant impacts of the proposed project, the No Project Alternative would have **no impact** related to public services and recreation.

5.1.2.14 Utilities and Service Systems

Implementation of the No Project Alternative would result in the continuation of existing conditions on the project site. Therefore, the No Project Alternative would not require the relocation or construction of any new utilities or new or expanded entitlements including increased demand for water supply, and would not result in the generation of any wastewater or solid waste. New wastewater infrastructure would not be required, and implementation of Mitigation Measure UTL-1 would not be necessary. Compared to the less than significant impacts of the proposed project, the No Project Alternative would have **no impact** related to utilities and service systems.

5.1.2.15 Energy

Implementation of the No Project Alternative would not result in any demolition activities or include any new construction. As a result, this alternative would not result in any environmental impacts associated with the wasteful, inefficient, or unnecessary consumption of energy resources. Similarly, the No Project Alternative would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, compared to the less than significant impacts of the proposed project, the No Project Alternative would have **no impact** related to energy.

However, it should be noted that implementation of the No Project Alternative would not result in the reduction of operational energy use provided by the proposed project due to the reduction in daily vehicle trips to and from the project site. As discussed in Section 4.8, Transportation, implementation of the proposed project would result in a net reduction of 3,585 daily vehicle trips to and from the project site. This reduction in daily vehicle trips would decrease the amount of vehicle fuel used during operational vehicle trips to and from the project site and reduce the overall

energy use associated with transportation to and from the project site. In addition, the No Project Alternative would not replace any of the mall's existing buildings with new buildings constructed to current energy conservation codes and using electricity rather than natural gas for space heating, as would the proposed project.

5.2 Reduced Development Alternative

The following provides a description of the Reduced Development Alternative and its anticipated environmental impacts. The emphasis of the analysis is on comparing the anticipated environmental impacts of the Reduced Development Alternative to the environmental impacts associated with the proposed project. The discussion includes a determination of whether or not the Reduced Development Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed project.

5.2.1 Principal Characteristics

The Reduced Development Alternative would result in redevelopment of the project site with implementation of Phase 1 of the proposed project only. As described in Chapter 3.0, Project Description, Phase 1 would implement the 2025 Master Plan and would generally include the demolition of the Sears Auto Center and Sears Seasonal building (28,500 square feet of commercial space) and the RH Outlet building, the HomeGoods building, and Mall Shops East, which is approximately 144,432 square feet of the main building. Phase 1 would include the construction of approximately 44,380 square feet of new commercial space. Overall, Phase 1 would result in a reduction in gross leasable area on the project site from approximately 766,507 square feet to 501,941 square feet. Therefore, it is estimated that Phase 1 would result in a reduction in employees from approximately 2,190 to 1,434.

Under this alternative, Phase 1 of the project would include the construction of a total of 922 residential units within three apartment-style residential buildings (containing 822 units), each on their own parcel, and 15 townhome buildings (containing 100 townhome units), all located on a fourth parcel. At least 10.4 percent of the 922 dwelling units constructed would be below market rate units set aside for low-income households (minimum of 96 dwelling units). Conservatively assuming the citywide average of 2.49 residents per dwelling unit, the residential population would be approximately 2,296 residents.

Phase 1 would provide approximately 601,227 square feet of open space, which would consist of approximately 295,659 square feet of useable open space and approximately 305,568 square feet of landscaped area. Phase 1 would also include the construction of a Town Square near the center of the project site, which would be approximately 48,075 square feet in size and would contain a large flexible lawn space, dog park, children's nature play features, water feature, flexible stage, fire features, lounge seating, and game tables.

In addition to the parking structures and private parking garages provided for each of the residential buildings, Phase 1 would also include nine surface parking lots throughout the project site. In total, Phase 1 would provide approximately 3,490 parking spaces, 1,587 of which would be reserved for use by residents and guests of the residential buildings, and the remaining 1,903 would be for commercial use.

Internal roadways that provide access to the project site (i.e., adjacent to Merrydale Road, Thorndale Drive) would generally remain the same. Internal roadways providing access to the surface parking lots and between the buildings would be reconfigured. New pedestrian and bicycle paths would be provided throughout the project site, and a multi-modal path would be provided along the Las Gallinas Avenue frontage.

Overall, construction of Phase 1 is anticipated to last approximately 19 to 32 months, and is anticipated to be fully operational and occupied by 2026. A total of approximately 62,416 cubic yards of soil would be excavated from the site, approximately 39,738 cubic yards of which would be used on the project site and approximately 22,677 cubic yards of which would be exported. Phase 1 would include the demolition of approximately 308,946 square feet of building space and approximately 15.66 acres of asphalt. A total of approximately 26,048 tons of demolition waste would be generated in Phase 1, of which 7,189 tons of demolished building material would be reused on site while 18,859 tons would be exported off site.

5.2.2 Analysis of the Reduced Development Alternative

The potential impacts associated with the Reduced Development Alternative are described below. As discussed, the Reduced Development Alternative would slightly reduce the less than significant impacts related to air quality, energy, and noise for the proposed project due to the reduced construction and operation intensity, and would avoid the noise impact on Phase 1 residents from Phase 2 construction, but would not eliminate any of the required construction-period mitigation measures. The Reduced Development Alternative would also slightly decrease impacts associated with GHG emissions and heating, ventilation, and air conditioning (HVAC) operational noise on project residents, but would not reduce those impacts to less than significant levels. In addition, the Reduced Development Alternative would meet all of the identified project objectives detailed in Chapter 3.0, Project Description, although to a lesser extent due to the reduction in total number of residential units to be developed.

5.2.2.1 Land Use and Planning

The Reduced Development Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units and more commercial space than full buildout of the proposed project. Similar to the proposed project, the Reduced Development Alternative would not result in the physical division of an established community because the changes in land use would be confined to the project site. Similar to the proposed project, the site would be rezoned to the Planned Development (PD) district, to allow development of the site and flexibility in site design. At 501,941 square feet of commercial space, the Reduced Development Alternative would have a floor area ratio (FAR) of 0.26, compared to the 0.11 FAR for the proposed project. Similar to the proposed project, the Reduced Development Alternative would include a request to use the density bonus afforded to the proposed project by providing affordable housing to modify the development standards for height on the project site to allow buildings up to 90 feet in height. Similar to the proposed project, the Reduced Development Alternative would also be generally consistent with the land use and planning-related policies outlined in the General Plan, and no adverse physical environmental

effects would result from any policy inconsistencies. Therefore, similar to the proposed project, impacts to land use and planning would be **less than significant**.

5.2.2.2 Population and Housing

The Reduced Development Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units and more commercial space than full buildout of the proposed project. The Reduced Development Alternative would continue to provide short-term construction jobs, although fewer than the proposed project because construction would only consist of one phase lasting 19 to 32 months. The Reduced Development Alternative's contribution to the number of residential units planned for and anticipated by the City would remain the same in 2025, but would be reduced to 25.4 percent of the population increase⁴ by 2040 and 26.6 percent of the households, compared to the proposed project's contribution of 39.2 percent and 41.1 percent, respectively. The Reduced Development Alternative would also generate increased demand for housing from additional nonresidential square footage compared to the proposed project because it would include more commercial space. However, the commercial space would still be reduced compared to existing conditions; therefore, overall demand for housing would still be anticipated to decrease. Similar to the proposed project, the Reduced Development Alternative would result in a reduction in employees on the project site and add to the supply of market rate and affordable housing, and would moderate displacement pressures to some degree by relieving market pressures on existing housing stock, although to a lesser degree than the proposed project because fewer residential units would be developed. Therefore, similar to the proposed project, impacts to population and housing would be **less than significant**.

5.2.2.3 Visual Resources

The Reduced Development Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with construction of fewer new buildings than the proposed project. Similar to the proposed project, the Reduced Development Alternative would include new buildings on the project site that would extend up to 78 feet in height and up to 90 feet with elevator penthouses and other projections, although there would be fewer buildings compared to the proposed project, which would reduce the overall mass of the project as seen from a distance. These buildings would be in the same locations as Phase 1 of the proposed project, but omitting the Phase 2 buildings would slightly reduce the impact to public views of identified scenic resources. Similar to the proposed project, the Reduced Development Alternative would not be located near any eligible or designated State Scenic Highways and therefore would not impact any scenic resources. Similar to the proposed project, the Reduced Development Alternative would include regulations built into the PD district, would conform with the design review process, and therefore would not conflict with the visual quality-related policies and programs set forth in the San Rafael General Plan. The Reduced Development Alternative would introduce slightly less lighting to the project site compared to the proposed project because it would include fewer residential buildings; therefore, the less than significant impacts related to light and glare would be slightly reduced. Similarly, increased shadows would be slightly reduced due to fewer

⁴ Based on the conservative assumption of 2.49 persons per household which, under the Reduced Density Alternative, equates to 2,296 residents.

new buildings on the site. Therefore, similar to the proposed project, impacts to visual resources would be **less than significant**.

5.2.2.4 Cultural Resources

The Reduced Development Alternative would result in redevelopment of the project site but with overall less demolition activity and ground disturbance than the proposed project and reduced new construction. Similar to the proposed project, implementation of this alternative would not result in any impacts to historic architectural resources because none are present on the site. The Reduced Development Alternative would include the same footprint as the proposed project and therefore would result in the same less than significant impacts to the Terra Linda Valley Neighborhood, which does qualify as a historic resource under CEQA, as the proposed project. Similar to the proposed project, the Reduced Development Alternative would have the potential to impact archaeological deposits or resources due to the generally level topography and presence of a drainage to South Fork Creek. Implementation of Mitigation Measures CUL-1a through CUL-1c would be required to reduce construction-period impacts to archaeological resources. Finally, similar to the proposed project, the Reduced Development Alternative would be required to comply with Section 7050.5 of the California Health and Safety Code and Public Resources Code (PRC) Section 5097.98. Therefore, similar to the proposed project, impacts to cultural resources would be **less than significant with mitigation**.

5.2.2.5 Tribal Cultural Resources

The Reduced Development Alternative would result in redevelopment of the project site but with overall less ground disturbance than the proposed project. Similar to the proposed project, the Reduced Development Alternative would have the potential to impact tribal cultural resources because it would be located on the same site and include ground-disturbing activities. Implementation of Mitigation Measures TCR-1a and TCR-1b would be required to reduce construction-period impacts to tribal cultural resources. Therefore, similar to the proposed project, impacts to tribal cultural resources would be **less than significant with mitigation**.

5.2.2.6 Geology and Soils

The Reduced Development Alternative would result in redevelopment of the project site but with overall less demolition activity and ground disturbance than the proposed project and reduced new construction. Similar to the proposed project, the Reduced Development Alternative would not result in any impacts associated with proximity to an Alquist-Priolo Earthquake Fault Zone. The Reduced Development Alternative would be required to be designed and constructed in accordance with the recommendations of the Geotechnical Investigation prepared for the proposed project and the California Building Code (CBC), and therefore would have the same less than significant impacts related to ground shaking. The Reduced Development Alternative would be located on the same site as the proposed project, and therefore would result in the same less than significant impacts related to liquefaction, seismic settlement, lateral spreading, and landslides. However, similar to the proposed project, the Reduced Development Alternative would also be susceptible to impacts from expansive and unstable soils. Implementation of Mitigation Measures GEO-1 and GEO-2 would be required. Additionally, similar to the proposed project, the Reduced Development Alternative could result in impacts to previously undiscovered paleontological resources. Implementation of

Mitigation Measure GEO-3 would be required. Therefore, similar to the proposed project, impacts to geology and soils would be **less than significant with mitigation**.

5.2.2.7 Hydrology and Water Quality

The Reduced Development Alternative would result in redevelopment of the project site but with overall less demolition activity and ground disturbance than the proposed project and reduced new construction. Similar to the proposed project, the Reduced Development Alternative would require dewatering activities and could contribute to the migration of contaminated groundwater to previously uncontaminated areas, and implementation of Mitigation Measure HYD-1 would be required. The Reduced Development Alternative would include new residential uses on the project site and could interfere with sustainable management of groundwater in the Santa Rosa Plain Subbasin due to increased water demand, although the number of residential units would be reduced compared to the proposed project. However, implementation of Mitigation Measure HYD-2 would still be required because Sonoma Water's 2020 Urban Water Management Plan does not assume any residential uses on the project site. Similar to the proposed project, the Reduced Development Alternative would be required to treat stormwater runoff consistent with the General Permit for the Discharge of Storm Water from Small Municipal Separate Storm Sewer Systems (Small MS4 Permit), which would ensure less than significant impacts related to erosion and siltation. Finally, the stormwater infrastructure included in the Reduced Development Alternative would be the same as the proposed project and therefore could result in flooding on the project site and surrounding roadways. Therefore, implementation of Mitigation Measure HYD-3 would be required. Therefore, similar to the proposed project, impacts to hydrology and water quality would be **less than significant with mitigation**.

5.2.2.8 Hazards and Hazardous Materials

The Reduced Development Alternative would result in redevelopment of the project site but with overall less demolition activity and ground disturbance than the proposed project and reduced new construction. Therefore, the Reduced Development Alternative would result in the same less than significant impacts related to the routine use of hazardous materials. The Reduced Development Alternative would include demolition of existing buildings; therefore, Mitigation Measure HAZ-1 would be required to reduce potential impacts related to the release of hazardous materials into the environment. The Reduced Development Alternative would be located on the same site as the proposed project and would result in the same potentially significant impacts related to subsurface hazardous materials; therefore, Mitigation Measure HAZ-2 would be required. Similar to the proposed project, the Reduced Development Alternative would not result in any impacts related to hazardous material use or release near schools, sites listed pursuant to Government Code Section 65962.5, or aviation hazards. Finally, the Reduced Development Alternative would slightly reduce the less than significant impacts related to emergency response because it would include fewer residential uses on the project site. Therefore, similar to the proposed project, impacts to hazards and hazardous materials would be **less than significant with mitigation**.

5.2.2.9 Transportation

The Reduced Development Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units

and more commercial space than full buildout of the proposed project. The Reduced Development Alternative would generate vehicle trips to and from the project site during construction, although fewer than the proposed project because construction would only consist of one phase lasting 19 to 32 months. In addition, the Reduced Development Alternative would generate fewer vehicle trips associated with residential uses because the Reduced Development Alternative would develop fewer residential units than the proposed project. Although the Reduced Development Alternative would retain more commercial space than full buildout of the proposed project, the commercial space would still be reduced compared to existing conditions; therefore, the overall impact associated with vehicle trips to and from the project site would still be anticipated to decrease. Specifically, Phase 1 of the proposed project is expected to generate an average of 20,739 trips per day, including 735 trips during the AM peak hour and 1,734 during the PM peak hour. After deductions are taken into account, the Reduced Development Alternative would be expected to generate a net reduction of 3,585 trips on a daily basis, including adding 172 trips during the AM peak hour and 345 fewer trips during the PM peak hour compared to existing conditions (see Table 4.9.D in Section 4.9, Transportation). Compared to buildout of the proposed project, however, the total number of daily trips (with and without trip deductions) would increase by 4,799 trips. Similarly, AM peak-hour trips would decrease by 5 and PM peak-hour trips would increase by 541 (also refer to Table 4.9.E in Section 4.9, Transportation). Overall, similar to the proposed project, the Reduced Development Alternative would not conflict with applicable transportation-related plans, policies and ordinances, design hazards, and emergency access.

As discussed in Section 4.9, Transportation, Phase 1 of the proposed project is projected to produce 11.0 VMT per capita related to residential land uses under the existing baseline scenario, reducing to 9.0 VMT per capita under the 2040 scenario. Therefore, the residential components of the proposed project would have a less than significant impact on VMT during implementation of Phase 1. In addition, Phase 1 would also be expected to reduce the total retail VMT generated at the project site by approximately 38,350 to 39,600 miles per day as compared to existing conditions. In the year 2040 with buildout of Phase 2, the total retail VMT is projected to be approximately 81,100 miles less per day than existing conditions. Since the redevelopment of retail uses proposed by the project would lead to a reduction in total retail VMT, the project's retail component is considered to have a less than significant impact on VMT. Therefore, similar to the proposed project, the Reduced Development Alternative would result in less than significant VMT impacts.

Implementation of Mitigation Measure TRA-1, ensuring that a minimum of 216 feet of sight distance would be available for drivers at the driveway 280 feet north of Northgate Drive/Thorndale Drive, would be required to reduce impacts associated with transportation hazards. With implementation of Mitigation Measure TRA-1, similar to the proposed project, impacts to transportation would be **less than significant with mitigation**.

5.2.2.10 Air Quality

The Reduced Development Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units and more commercial space than full buildout of the proposed project. Grading activities would be reduced compared to the proposed project and therefore pollutant and odor concentrations would decrease and, although dust, exhaust, and organic emissions would also be generated related to

construction, this would occur to a lesser extent than the proposed project. However, implementation of Mitigation Measure AIR-2 would still be required to reduce construction-period air quality impacts. The Reduced Development Alternative would also generate reactive organic gases (ROGs) and nitrogen oxides (NO_x) emissions in excess of thresholds established by the BAAQMD during construction of Phase 1 (see Table 4.10.E in Section 4.10, Air Quality), and implementation of Mitigation Measures AIR-3a and AIR-3b would be required to reduce this impact to a less than significant level (see Table 4.10.F in Section 4.10, Air Quality). Note that this impact does not occur with implementation of Phase 2 of the proposed project. Finally, similar to the proposed project, this alternative would result in an increased intensity of uses on the site compared to existing conditions and area source emissions would be increased though to a lesser extent than the proposed project. However, daily operational energy and mobile source emissions would be decreased compared to existing conditions and increased compared to the proposed project due to the increased commercial square footage that would continue to operate under this alternative (see Table 4.10.G in Section 4.10, Air Quality). Overall, impacts related to Clean Air Plan implementation would be slightly increased compared to the proposed project but would also be less than significant. In addition, health risks to on-site Phase 1 resident sensitive receptors would not occur under this alternative because no new construction would occur within the project site after completion of Phase 1; therefore, Mitigation Measure AIR-4 would not be required. Therefore, similar to the proposed project, impacts to air quality would be **less than significant with mitigation**.

5.2.2.11 Greenhouse Gas Emissions

The Reduced Development Alternative would result in redevelopment of the project site with commercial and residential uses similar to the proposed project, but with fewer residential units and more commercial space than full buildout of the proposed project. Construction activities would be reduced compared to the proposed project because construction would only consist of one phase lasting 19 to 32 months; therefore, associated construction-period GHG emissions would decrease as compared to the proposed project and would remain **less than significant**.

Operation-period emissions associated with the Reduced Development alternative would occur, similar to the proposed project, although compared to existing conditions, mobile source emissions would not be reduced to the same extent as the proposed project. Similar to the proposed project, implementation of Mitigation Measure GHG-1 would be required to ensure that natural gas fire pits are not included in the project design, but for the same reasons as the proposed project, prohibition of natural gas in commercial kitchens would be infeasible; therefore, the Reduced Residential Alternative would conflict with the BAAQMD's thresholds established for the purpose of reducing GHG emissions and would result in the generation of GHG emissions that would have a significant impact on the environment. Therefore, similar to the proposed project, impacts related to GHG emissions would be **significant and unavoidable**.

5.2.2.12 Noise

The Reduced Development Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units and more commercial space than full buildout of the proposed project. Similar to the proposed project, there also would be no impact related to aircraft-related noise. Although the Reduced Development Alternative would retain more commercial space than full buildout of the proposed

project, the commercial space would still be reduced compared to existing conditions; therefore, the overall impact associated with vehicle trips to and from the project site would still be anticipated to decrease. Overall, as discussed above, vehicle trips to and from the site would still decrease compared to existing conditions, though not to the same extent as the proposed project. Therefore, increases in roadway traffic noise would continue to be less than significant under this alternative, although the reduction would be less than the proposed project. Similarly, exposure of off-site sensitive receptors to construction-period noise would still occur under this alternative because Residential Parcels 2 and 3 would still be constructed within proximity to nearby sensitive land uses and this construction activity would exceed established thresholds (refer to Tables 4.12.G and 4.12.H in Section 4.12, Noise). Therefore, implementation of Mitigation Measure NOI-1, requiring the installation of construction-period sound barriers, would continue to be required to reduce exposure of noise sensitive land uses to construction noise. Note that with elimination of Phase 2, the noise impact on Phase 1 residents of Phase 2 construction is avoided. Similar to the proposed project, because a new mix of land uses and sensitive receptors would be introduced to the site under the Reduced Development Alternative, the significant and unavoidable impact to on-site residential land uses would remain and Mitigation Measure NOI-2 would be required. However, the ability of this measure to achieve a less than significant noise impact cannot be determined. Therefore, similar to the proposed project, impacts related to noise would be **significant and unavoidable**.

5.2.2.13 Public Services and Recreation

The Reduced Development Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units and more commercial space than full buildout of the proposed project. The Reduced Development Alternative would generate demand for public services and recreation facilities; however, this demand would be less when compared to the proposed project because the Reduced Development Alternative would develop fewer residential units and therefore result in a reduced increase in population on the site compared to the proposed project. Although the Reduced Development Alternative would retain more commercial space than full buildout of the proposed project, the commercial space would still be reduced compared to existing conditions, and therefore overall demand on public services and recreation facilities would still be anticipated to decrease. Therefore, similar to the proposed project, impacts related to public services and recreation would be **less than significant**.

5.2.2.14 Utilities and Service Systems

The Reduced Development Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units and more commercial space than full buildout of the proposed project. The Reduced Development Alternative would generate demand for utilities and service systems; however, this demand would be less when compared to the proposed project because the Reduced Development Alternative would develop fewer residential units and therefore result in a reduced increase in population on the site compared to the proposed project. Although the Reduced Development Alternative would retain more commercial space than full buildout of the proposed project, the commercial space

would still be reduced compared to existing conditions; therefore, the overall demand on utilities and service systems facilities would still be anticipated to decrease.

Although implementation of the Reduced Development Alternative would decrease the overall demand on utilities and service systems compared to the proposed project, the increase in wastewater generation at the project site would still require that the existing 12-inch-diameter Terra Linda Trunk Sewer line downstream of the project site be upsized to a 15-inch diameter in coordination with the Las Gallinas Valley Sanitation District. According to Section 4.14, Utilities and Service Systems, the existing 12-inch-diameter sewer line could accommodate approximately 384 units with no modifications. However, this is not sufficient to accommodate implementation of Phase 1 of the proposed project, which includes development of up to 922 residential units. To address the capacity deficiency in this portion of the Terra Linda Trunk Sewer and allow for additional development, the 12-inch-diameter sewer line would need to be up-sized. With implementation of Mitigation Measure UTL-1, requiring improvements to the surrounding sewer system infrastructure, impacts related to utilities and service systems would be **less than significant with mitigation**, similar to the proposed project.

5.2.2.15 Energy

The Reduced Development Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units and more commercial space than full buildout of the proposed project. Construction activities would be reduced compared to the proposed project because construction would only consist of one phase lasting 19 to 32 months. Therefore, associated energy usage would decrease as compared to the proposed project. The Reduced Development Alternative would use energy during operation; however, this usage would be less when compared to the proposed project because the Reduced Development alternative would develop fewer residential units. Although the Reduced Development alternative would retain more commercial space than full buildout of the proposed project, the commercial space would still be reduced compared to existing conditions, and therefore overall energy usage would still be anticipated to decrease.

Similar to the proposed project, implementation of the Reduced Development Alternative would use renewable energy on site as determined to be feasible and would not result in wasteful, inefficient, or unnecessary consumption of energy resources, including electricity, natural gas, or petroleum, during construction or operation. In addition, because the Reduced Development Alternative would comply with and exceed the existing energy standards and regulations, similar to the proposed project, implementation would not conflict with energy standards and regulations. Therefore, similar to the proposed project, impacts related to energy would be **less than significant**.

5.3 REDUCED RESIDENTIAL ALTERNATIVE

The following provides a description of the Reduced Residential Alternative and its anticipated environmental impacts. The emphasis of the analysis is on comparing the anticipated environmental impacts of the Reduced Residential Alternative to the environmental impacts associated with the proposed project. The discussion includes a determination of whether or not the Reduced

Residential Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed project.

5.3.1 Principal Characteristics

The Reduced Residential Alternative would result in redevelopment of the project site according to the Phase 1 2025 Master Plan and Phase 2 2040 Vision Plan as described in Chapter 3.0, Project Description, with the exception that the total number of residential units would be reduced from 1,422 to 1,359, with a resulting decrease in residential population from 3,541 to 3,384 based on the conservative General Plan 2040 assumption of 2.49 residents per household. Total residential square footage would be reduced from 1,746,936 square feet to 1,704,762 square feet (a reduction of 41,174 square feet). The reduction in the number of residential units would occur during Phase 1, where the total number of units would be reduced by 63 from 922 units to 859 units. Specifically, Residential 1, at the southwest corner of the site, would be developed with 33 townhomes units at a height of 35 feet, rather than the 96 apartment units in a five-story building proposed by the project. Residential buildings 2, 3, and 4 would include the same number and mix of units as the proposed project, including 100 townhomes, 280 apartments, and 446 apartments, respectively.

Although the Residential 1 parcel would not be developed with an apartment building restricted to low-income households as proposed by the project, this alternative would continue to comply with Section 14.16.030 of the City's Zoning Ordinance for the provision of below market rate units, with up to 10 percent (136) of the units restricted to low-income households. This would be achieved by the inclusion of 86 units of low-income households within the Phase 1 market rate multi-family residential developments and an additional 50 units of low-income households with the Phase 2 market rate multi-family residential developments.

With the reduced number of residential units, the total parking count under this alternative would be reduced to 3,824 spaces as compared to the 3,849 spaces provided by the proposed project. A total of 2,499 parking spaces would be available for residents and guests and 1,325 spaces would be for commercial uses. Total open space would be the same as for the proposed project (705,384 square feet). At buildout, the total commercial area would be the same as the proposed project, at 217,520 square feet. All other components of the proposed project, including on- and off-site circulation, demolition and construction activity, and phasing would be similar to the proposed project.

5.3.2 Analysis of the Reduced Residential Alternative

The potential impacts associated with the Reduced Residential Alternative are described below. As discussed, the Reduced Residential alternative would slightly reduce the less than significant impacts related to air quality, GHG emissions, energy, and noise for the proposed project due to the reduced operational intensity and reduction in vehicle trips associated with fewer residential units, but would not eliminate any of the required construction- or operation-period mitigation measures. In addition, the Reduced Residential Alternative would meet all of the identified project objectives detailed in Chapter 3.0, Project Description, although to a lesser extent due to the reduction in total number of residential units to be developed.

5.3.2.1 Land Use and Planning

The Reduced Residential Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units than full buildout of the proposed project. Similar to the proposed project, the Reduced Residential Alternative would not result in the physical division of an established community because the changes in land use would be confined to the project site. Similar to the proposed project, the site would be rezoned to the PD district to allow development of the site and flexibility in site design. The total residential density of the Reduced Residential Alternative would be 30.36 dwelling units per acre, whereas the proposed project density would be 31.8 units per acre. The commercial FAR would be the same at 0.11. Similar to the proposed project, the Reduced Residential Alternative would include a request to use the density bonus afforded to the proposed project by providing affordable housing to modify the development standards for height on the project site to allow buildings up to 90 feet in height. Similar to the proposed project, the Reduced Residential alternative would also be generally consistent with the land use and planning-related policies outlined in the General Plan, and no adverse physical environmental effects would result from any policy inconsistencies. Therefore, similar to the proposed project, impacts to land use and planning would be **less than significant**.

5.3.2.2 Population and Housing

The Reduced Residential Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units than full buildout of the proposed project. The Reduced Residential Alternative would continue to provide short-term construction jobs similar to the proposed project. However, the total number of residential units at buildout would be reduced from 1,422 to 1,359, or 63 fewer units. The number of units developed during Phase 1 would be reduced from 922 units to 859 units, and the number of units to be developed during Phase 2 would be the same at 500 units. Using the conservative General Plan 2040 calculation of 2.49 residents per household, this alternative would result in a total residential population on the site of 3,384, for a reduction of 157 residents compared to the proposed project's population of 3,541 residents. This also equates to a reduction in the residential population at completion of Phase 1 from 2,295 to 2,138 residents.

The Reduced Residential Alternative's contribution to the number of residential units planned for and anticipated by the City would be reduced in 2025 and through buildout in 2040 through the reduction in the number of residential units compared to the proposed project. Specifically, the Reduced Residential Alternative's contribution to the city's projected population increase in 2025 would be reduced to 39.7 percent of the projected population increase and 150.2 percent of the projected household increase, as compared to the project's contribution of 42.7 percent and 161 percent, respectively. In 2040, the population increase would be reduced to 37.5 percent and the number of households would be reduced to 39.3 percent, compared to the proposed project's contribution of 39.2 percent and 41.1 percent, respectively.

The Reduced Residential Alternative would also generate a similar reduced demand for housing from nonresidential square footage compared to the proposed project because it would include the same amount of commercial space. Similar to the proposed project, the Reduced Residential Alternative would result in a reduction in employees on the project site, add to the supply of market

rate and affordable housing, and would moderate displacement pressures to some degree by relieving market pressures on existing housing stock, although to a lesser degree than the proposed project because fewer residential units would be developed. Therefore, similar to the proposed project, impacts to population and housing would be **less than significant**.

5.3.2.3 Visual Resources

The Reduced Residential Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with construction of fewer residential units than the proposed project. The reduction in units would occur on the Residential 1 parcel at the southwest corner of the site, along Northgate Drive between Thorndale Drive and El Faison Drive, where the proposed five-story (60-foot), 96-unit apartment building for the proposed project would be located. Under this alternative, this parcel would be developed with 33 residential townhome units, up to 35 feet in height. Similar to the proposed project, the Reduced Residential Alternative would include new buildings across the remainder of the project site that would extend up to 78 feet in height and up to 90 feet with elevator penthouses and other projections. Other than the Residential 1 parcel, where overall building heights would be reduced, all other building locations and heights would be the same as the proposed project. With the reduction in building heights and massing at this location, views from the north along Manuel T. Freitas Parkway toward the surrounding hillsides to the south (Viewpoint 2 as described in Section 4.3, Visual Resources, and shown on Figure 4.3-6), would be slightly less obstructed under this alternative as compared to the proposed project. The Residential 1 parcel is not prominently visible in any of the other viewpoints considered in the evaluation of impacts to scenic resources. Therefore, impacts to views of scenic resources would be slightly reduced but similar overall to the less than significant impacts of the proposed project.

Similar to the proposed project, the Reduced Residential Alternative would not be located near any eligible or designated State Scenic Highways, and therefore would not impact any scenic resources. Similar to the proposed project, the Reduced Residential Alternative would include regulations built into the PD district, would conform with the design review process, and therefore would not conflict with the visual quality-related policies and programs set forth in the San Rafael General Plan. The Reduced Residential Alternative would introduce slightly less lighting to the project site compared to the proposed project because it would include lower scale development at the southwest corner of the site; therefore, the less than significant impacts related to light and glare would be slightly reduced. Similarly, increased shadows would be slightly reduced due to the lower buildings heights on the Residential 1 parcel on the site. Therefore, similar to the proposed project, impacts to visual resources would be **less than significant**.

5.3.2.4 Cultural Resources

The Reduced Residential Alternative would result in redevelopment of the project site similar to the proposed project, including the same amount of demolition activity and ground disturbance. Similar to the proposed project, implementation of this alternative would not result in any impacts to historic architectural resources because none are present on the site. The Reduced Residential Alternative would include the same development footprint as the proposed project, and therefore would result in the same less than significant impacts to the Terra Linda Valley Neighborhood (which does qualify as a historic resource under CEQA) as the proposed project. Similar to the proposed

project, the Reduced Residential Alternative would have the potential to impact archaeological deposits and resources due to the generally level topography and presence of a drainage to South Fork Creek. Implementation of Mitigation Measures CUL-1a through CUL-1c would be required to reduce construction-period impacts to archaeological resources. Finally, similar to the proposed project, the Reduced Residential Alternative would be required to comply with Section 7050.5 of the California Health and Safety Code and PRC Section 5097.98. Therefore, similar to the proposed project, impacts to cultural resources would be **less than significant with mitigation**.

5.3.2.5 Tribal Cultural Resources

The Reduced Residential Alternative would result in redevelopment of the project site similar to the proposed project, including the same amount of ground disturbance. Similar to the proposed project, the Reduced Residential Alternative would have the potential to impact tribal cultural resources because it would be located on the same site and include ground-disturbing activities. Implementation of Mitigation Measures TCR-1a and TCR-1b would be required to reduce construction-period impacts to tribal cultural resources. Therefore, similar to the proposed project, impacts to tribal cultural resources would be **less than significant with mitigation**.

5.3.2.6 Geology and Soils

The Reduced Residential Alternative would result in redevelopment of the project site similar to the proposed project, including the same amount of demolition activity and ground disturbance, and a similar level of new construction in the same locations. Similar to the proposed project, the Reduced Residential Alternative would not result in any impacts associated with proximity to an Alquist-Priolo Earthquake Fault Zone. The Reduced Residential Alternative would be required to be designed and constructed in accordance with the recommendations of the Geotechnical Investigation prepared for the proposed project and the CBC, and therefore would have the same less than significant impacts related to ground shaking. The Reduced Residential Alternative would be located on the same site as the proposed project, and therefore would result in the same less than significant impacts related to liquefaction, seismic settlement, lateral spreading, and landslides. However, similar to the proposed project, the Reduced Residential Alternative would also be susceptible to impacts from expansive and unstable soils. Implementation of Mitigation Measures GEO-1 and GEO-2 would be required. Additionally, similar to the proposed project, the Reduced Residential Alternative could result in impacts to previously undiscovered paleontological resources. Implementation of Mitigation Measure GEO-3 would be required. Therefore, similar to the proposed project, impacts to geology and soils would be **less than significant with mitigation**.

5.3.2.7 Hydrology and Water Quality

The Reduced Residential Alternative would result in redevelopment of the project site similar to the proposed project, including the same amount of demolition activity and ground disturbance, and a similar level of new construction in the same locations. Similar to the proposed project, the Reduced Residential Alternative would require dewatering activities and could contribute to the migration of contaminated groundwater to previously uncontaminated areas, and implementation of Mitigation Measure HYD-1 would be required. The Reduced Residential Alternative would include new residential uses on the project site and could interfere with sustainable management of groundwater in the Santa Rosa Plain Subbasin due to increased water demand, although the

number of residential units would be reduced compared to the proposed project. However, implementation of Mitigation Measure HYD-2 would still be required because Sonoma Water's 2020 Urban Water Management Plan does not assume any residential uses on the project site. Similar to the proposed project, the Reduced Residential Alternative would be required to treat stormwater runoff consistent with the Small MS4 Permit, which would ensure less than significant impacts related to erosion and siltation. Finally, the stormwater infrastructure included in the Reduced Residential Alternative would be the same as the proposed project, and therefore could result in flooding on the project site and surrounding roadways. Therefore, implementation of Mitigation Measure HYD-3 would be required. Therefore, similar to the proposed project, impacts to hydrology and water quality would be **less than significant with mitigation**.

5.3.2.8 Hazards and Hazardous Materials

The Reduced Residential Alternative would result in redevelopment of the project site similar to the proposed project, including the same amount of demolition activity and ground disturbance, and a similar level of new construction in the same locations. Therefore, the Reduced Residential Alternative would result in the same less than significant impacts related to the routine use of hazardous materials. The Reduced Residential Alternative would include demolition of existing buildings; therefore, Mitigation Measure HAZ-1 would be required to reduce potential impacts related to the release of hazardous materials into the environment. The Reduced Residential Alternative would be located on the same site as the proposed project and would result in the same potentially significant impacts related to subsurface hazardous materials. Therefore, Mitigation Measure HAZ-2 would be required. Similar to the proposed project, the Reduced Residential Alternative would not result in any impacts related to hazardous material use or release near schools, sites listed pursuant to Government Code Section 65962.5, or aviation hazards. Finally, the Reduced Residential Alternative would slightly reduce the less than significant impacts related to emergency response because it would include fewer residential uses on the project site. Therefore, similar to the proposed project, impacts to hazards and hazardous materials would be **less than significant with mitigation**.

5.3.2.9 Transportation

The Reduced Residential Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units than full buildout of the proposed project. The Reduced Residential Alternative would generate vehicle trips to and from the project site during construction, similar to the proposed project. However, the Reduced Residential Alternative would generate fewer vehicle trips associated with residential uses because the Reduced Residential Alternative would develop fewer residential units than the proposed project. The overall commercial square footage would be the same as the proposed project and would be reduced compared to existing conditions.

Due to the different mix of unit types and reduction in total units, trip generation for the Reduced Residential Alternative would be altered compared to the proposed project. Using the same trip generation rates at project buildout as presented in Table 4.9.D in Section 4.9, Transportation, the 125 townhome units would generate 900 daily trips, 60 AM peak-hour trips, and 71 PM peak-hour trips. The 1,234 apartment units would generate 5,602 daily trips, 457 AM peak-hour trips, and 481 PM peak-hour trips. At buildout, the Reduced Residential Alternative would therefore result in

18,243 daily trips, 783 AM peak-hour trips, and 1,564 PM peak-hour trips, not including deductions for internal trip capture or pass-by trips. The proposed project, at buildout, would generate an average of 18,441 trips per day, including 802 during the AM peak hour and 1,583 during the PM peak hour without deductions. With or without the same deductions for internal and pass-by trips, the Reduced Residential Alternative would result in a similar number of vehicle trips as the proposed project, with an overall reduction of 198 daily trips and 19 AM and PM peak-hour trips. Overall, this reduction would be negligible and, similar to the proposed project, the Reduced Residential Alternative would not conflict with applicable transportation-related plans, policies, and ordinances, design hazards, and emergency access.

As discussed in Section 4.9, Transportation, the VMT impacts associated with the proposed project would be below the regional average and would be less than significant. With the reduced residential population on the project site compared to the proposed project, total VMT would slightly decrease compared to the proposed project, and this impact would continue to be less than significant.

Implementation of Mitigation Measure TRA-1, ensuring that a minimum of 216 feet of sight distance would be available for drivers at the driveway 280 feet north of Northgate Drive/Thorndale Drive, would also likely be required to reduce impacts associated with transportation hazards. With implementation of Mitigation Measure TRA-1, similar to the proposed project, impacts to transportation would be **less than significant with mitigation**.

5.3.2.10 Air Quality

The Reduced Residential Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units. However, overall construction activity would be similar. Grading activities would be similar compared to the proposed project; therefore, pollutant and odor concentrations would be similar and dust, exhaust, and organic emissions would also be generated related to construction, similar to the proposed project. Implementation of Mitigation Measure AIR-2 would be required to reduce construction-period air quality impacts. The Reduced Residential Alternative would also generate ROG_s and NO_x emissions during Phase 1 construction in excess of thresholds established by the BAAQMD, and implementation of Mitigation Measures AIR-3a and AIR-3b would be required to reduce this impact to a less than significant level. Finally, similar to the proposed project, this alternative would result in an increased intensity of uses on the site compared to existing conditions, and area source emissions would be increased similar to the proposed project. Daily operational energy and mobile source emissions would also be similar to the proposed project, though slightly reduced due to the decrease in the number of vehicle trips. Overall, impacts related to Clean Air Plan implementation would be the same compared to the proposed project and would also be less than significant with implementation of Mitigation Measures AIR-2, AIR-3, and AIR-3b. In addition, health risks to on-site Phase 1 resident sensitive receptors would be the same under this alternative; therefore, Mitigation Measure AIR-4 would be required. Therefore, similar to the proposed project, impacts to air quality would be **less than significant with mitigation**.

5.3.2.11 Greenhouse Gas Emissions

The Reduced Residential Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units. Construction activities would be similar to the proposed project; therefore, associated construction-period GHG emissions would also be similar as compared to the proposed project and would remain less than significant.

Operation-period emissions associated with the proposed project would occur, similar to the proposed project. Similar to the proposed project, implementation of Mitigation Measure GHG-1 would be required to ensure that natural gas fire pits are not included in the project design, and for the same reasons as the proposed project, prohibition of natural gas in commercial kitchens would be infeasible. Therefore, the Reduced Residential Alternative would conflict with the BAAQMD's thresholds established for the purpose of reducing GHG emissions and would result in the generation of GHG emissions that would have a significant impact on the environment. Similar to the proposed project, impacts related to GHG emissions would therefore be **significant and unavoidable**.

5.3.2.12 Noise

The Reduced Residential Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units. Similar to the proposed project, there also would be no impact related to aircraft-related noise. The Reduced Residential Alternative would slightly reduce the number of vehicle trips generated by the proposed project due to the reduction in residential units; therefore, the overall impact associated with vehicle trips to and from the project site would also decrease compared to existing conditions and slightly more so than the proposed project. Increases in roadway traffic noise would therefore continue to be less than significant under this alternative. Similarly, exposure of off-site sensitive receptors to construction-period noise would still occur under this alternative because Residential Parcels 2 and 3 would still be constructed in proximity to nearby sensitive land uses, and this construction activity would exceed established thresholds (refer to Tables 4.12.G and 4.12.H in Section 4.12, Noise). Therefore, implementation of Mitigation Measure NOI-1, requiring the installation of construction-period sound barriers, would continue to be required to reduce exposure of noise sensitive land uses to construction noise. Similar to the proposed project, because a new mix of land uses and sensitive receptors would be introduced to the site under the Reduced Residential Alternative, the impact to on-site residential land uses would remain, although may be slightly reduced due to the decreased building heights, and Mitigation Measure NOI-2 would be required. However, the ability of this measure to achieve a less than significant noise impact cannot be determined. Therefore, similar to the proposed project, impacts related to noise would be **significant and unavoidable**.

5.3.2.13 Public Services and Recreation

The Reduced Residential Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project but with fewer residential units. The Reduced Residential Alternative would generate demand for public services and recreation facilities; however, this demand would be slightly less when compared to the proposed project

because the Reduced Residential Alternative would develop fewer residential units and therefore result in a reduced increase in population on the site compared to the proposed project. Therefore, similar to the proposed project, impacts related to public services and recreation would be **less than significant**.

5.3.2.14 Utilities and Service Systems

The Reduced Residential Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units. The Reduced Residential Alternative would generate demand for utilities and service systems; however, this demand would be less when compared to the proposed project because the Reduced Residential Alternative would develop fewer residential units and therefore result in a reduced increase in population on the site compared to the proposed project.

Although implementation of the Reduced Residential Alternative would decrease overall demand on utilities and service systems compared to the proposed project, the increase in wastewater generation at the project site would still require the existing 12-inch-diameter Terra Linda Trunk Sewer line downstream of the project site be upsized to 15 inches in diameter in coordination with the Las Gallinas Valley Sanitation District. According to Section 4.14, Utilities and Service Systems, the existing 12-inch-diameter sewer line could accommodate approximately 384 units with no modifications. However, this is not sufficient to accommodate implementation of Phase 1 of the Reduced Residential Alternative, which includes development of up to 859 residential units. To address the capacity deficiency in this portion of the Terra Linda Trunk Sewer and allow for additional development, the 12-inch-diameter sewer line would need to be up-sized. With implementation of Mitigation Measure UTL-1, requiring improvements to the surrounding sewer system infrastructure, impacts related to utilities and service systems would be **less than significant with mitigation**, similar to the proposed project.

5.3.2.15 Energy

The Reduced Residential Alternative would result in redevelopment of the project site with commercial and residential uses, similar to the proposed project, but with fewer residential units. Construction activities would be similar to the proposed project. Therefore, associated energy usage would be the same or similar as compared to the proposed project. The Reduced Residential Alternative would use energy during operation; however, this usage would be less when compared to the proposed project because the Reduced Residential Alternative would develop fewer residential units.

Similar to the proposed project, implementation of the Reduced Residential Alternative would use renewable energy on site as determined to be feasible and would not result in wasteful, inefficient, or unnecessary consumption of energy resources, including electricity, natural gas, or petroleum, during construction or operation. In addition, because the Reduced Residential alternative would comply with and exceed the existing energy standards and regulations, similar to the proposed project, implementation would not conflict with energy standards and regulations. Therefore, similar to the proposed project, impacts related to energy would be **less than significant**.

5.4 ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR FURTHER ANALYSIS

During the Notice of Preparation (NOP) comment period, the City received verbal and written suggestions for the identification and evaluation of alternatives to the proposed project (see Appendix A of this EIR). The following provides a description of various potential alternatives that were identified and considered, and the reasons why they were ultimately not selected for further evaluation in this EIR.

- **Off-Site Locations:** An alternative location was not considered for analysis because the project sponsor does not own or would not feasibly otherwise be able to gain control of a suitable vacant site within the region. In addition, an off-site location that could accommodate the density and mix of uses proposed for the site is not available within San Rafael. An alternative location located outside of this area would fail to meet several objectives of the project, including several objectives that relate directly to planned redevelopment of the Northgate Mall site and development of a site that is located within a Priority Development Area. It should also be noted that the project site is an urban infill site with existing infrastructure in close proximity to existing transit. If the proposed project were relocated to a different site that is not as well served by infrastructure and transit, impacts related to transportation, air quality, and GHG emissions (primarily related to VMT) could be greater than those identified in this EIR for the proposed project. Therefore, such an alternative was ultimately not selected for further analysis in the EIR.
- **All Residential Use:** An all residential alternative or increased residential alternative with or without additional affordable units or a different mix of housing types with a greater number of bedrooms was considered. The project site has a land use designation of Community Commercial Mixed Use, which allows for 21.8 to 43.6 units per net acre; therefore, at 44.76 acres, the project site could be developed with between 976 and 1,952 residential units under the existing land use and zoning regulations. However, such an alternative would not achieve the desired intent of the Community Commercial Mixed Use designation because the intent is to provide for a mix of uses on the site, including general retail and service uses, restaurants, automobile sales and service uses, hotels and motels, and other commercial activities. Residential projects are also permitted but are not desired as the sole use for the site as identified in the General Plan. Additionally, at 1,952 residential units on the site and no commercial uses, with a similar mix of townhomes (6.4 percent, or 125) and apartment (93.6 percent or 1,827) units as the proposed project, a total of approximately 9,195 daily vehicle trips would be generated, which is below the total number of trips generated by the proposed project; however, since the site would not include a mix of uses in the same location, internal and pass-by reductions would not occur and average trip lengths for project residents would likely increase, which could result in impacts related to VMT that would not occur with the proposed project.

In addition, a different mix of unit types or increased number of affordable units would not have a material effect on reducing any identified environmental impacts of the project. Furthermore, such an alternative would not meet many of the basic project objectives. Therefore, such an alternative was ultimately not selected for further analysis in the EIR.

- **Expanded Town Square:** An alternative that would include a more expansive central green space on the project site with a corresponding reduction in surface parking either through additional parking structures or underground parking was not considered for analysis because such an alternative would not substantially reduce any of the identified impacts of the proposed project and could result in additional impacts related to site circulation and additional excavation and construction activity, resulting in increased air quality, GHG, noise, and energy impacts. Additional impacts related to hazardous materials and hydrology and water quality could also result with the deeper excavations into potentially contaminated soils. Therefore, such an alternative was ultimately not selected for further analysis in the EIR.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based on the above analysis, the No Project Alternative would have the fewest impacts and would be the environmentally superior alternative. Under CEQA, if the No Project Alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative from among the other alternatives (*State CEQA Guidelines* Section 15126.6(e)(2)). While the No Project alternative would be environmentally superior in the technical sense in that contribution to the aforementioned impacts would not occur, it would also fail to achieve any of the project's objectives.

As discussed above and shown in Table 5.A below, the Reduced Residential Alternative would slightly reduce some of the potentially significant impacts of the proposed project through reduced construction and operational building intensities, including an overall reduction in the number of vehicle trips generated to and from the site, although none of the significant unavoidable project impacts would be avoided, and all project mitigation measures would still be required. The project objectives would also be largely met, although to a lesser extent than the proposed project, and the Reduced Residential Alternative would provide 63 fewer residential units than the proposed project, slightly reducing its contribution to alleviating the City's household deficit. Due to its slight reductions in some environmental impacts, the Reduced Residential Alternative is considered the environmentally superior alternative.

Table 5.A: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project (Without/With Mitigation)	No Project Alternative (Without/With Mitigation)	Reduced Development Alternative (Without/With Mitigation)	Reduced Residential Alternative (Without/With Mitigation)
4.1 Land Use and Planning				
Threshold 4.1.1: The proposed project would not eliminate or reduce existing levels of connectivity within San Rafael or other communities.	LTS	NI	~LTS	~LTS
Threshold 4.1.2: The proposed project would not result in a conflict related to the provisions of applicable planning documents, due to the significant impacts identified in the EIR.	LTS	LTS	~LTS	~LTS
4.2 Population and Housing				
Threshold 4.2.1: The proposed project would not induce substantial unplanned population growth, either directly or indirectly.	LTS	NI	<LTS	<LTS
Threshold 4.2.2: The proposed project would not directly or indirectly displace existing housing or people such that construction of replacement housing would be needed elsewhere and in turn result in one or more significant environmental effects.	LTS	NI	>LTS	~LTS
4.3 Visual Resources				
Threshold 4.3.1: The proposed project would not substantially or completely block public views of identified scenic resources.	LTS	NI	<LTS	~LTS
Threshold 4.3.2: The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.	LTS	NI	~LTS	~LTS
Threshold 4.3.3: The proposed project would not conflict with applicable zoning and other regulations governing scenic quality.	LTS	NI	~LTS	~LTS
Threshold 4.3.4: The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	LTS	NI	<LTS	~LTS
Threshold 4.3.5: The proposed project would not create new shadow that substantially and adversely affects the use and enjoyment of publicly-accessible open spaces.	LTS	NI	<LTS	~LTS
4.4 Cultural Resources				
Threshold 4.4.1: The proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines Section 15064.5.	LTS	NI	~LTS	~LTS
Threshold 4.4.2: Project ground disturbance has the potential to unearth significant archaeological deposits or resources, resulting in a potential substantial adverse change on historical resources, as defined in State CEQA Guidelines Section 15064.5 (Impact CUL-1).	S LTS/M	NI	~S LTS/M	~S LTS/M
Threshold 4.4.3: The proposed project would not disturb any human remains, including those interred outside of formal cemeteries.	LTS	NI	~LTS	~LTS

Table 5.A: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project (Without/With Mitigation)	No Project Alternative (Without/With Mitigation)	Reduced Development Alternative (Without/With Mitigation)	Reduced Residential Alternative (Without/With Mitigation)
4.5 Tribal Cultural Resources				
Threshold 4.5.1: Project ground disturbance has the potential to disturb, damage, or degrade either a tribal cultural resource, or the contextual setting of such a resource, resulting in a substantial loss of the resource’s cultural value as determined in consultation with the Federated Indians of Graton Rancheria (Impact TCR-1).	S LTS/M	NI	~S LTS/M	~S LTS/M
4.6 Geology and Soils				
Threshold 4.6.1: The proposed project would not directly or indirectly cause a substantial risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zones Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.	NI	NI	~NI	~NI
Threshold 4.6.2: The proposed project would not directly or indirectly cause a substantial risk of loss, injury, or death involving the construction of new buildings for human occupancy or other infrastructure or structures that would not comply with the most recently adopted California Building Code seismic standards applicable to ground shaking events.	LTS	NI	~LTS	~LTS
Threshold 4.6.3: Proposed and existing improvements could be damaged due to expansive soil conditions (Impact GEO-1).	S LTS/M	NI	~S LTS/M	~S LTS/M
Threshold 4.6.4: Placement of new loads on the project site, vibration-generating construction activities, and excavation and dewatering activities could result in subsidence, settlement, or differential settlement that could adversely affect the proposed and existing structures and other improvements (Impact GEO-2).	S LTS/M	NI	~S LTS/M	~S LTS/M
Threshold 4.6.5: The project could directly or indirectly destroy a unique paleontological resource or site (Impact GEO-3).	S LTS/M	NI	~S LTS/M	~S LTS/M
4.7 Hydrology and Water Quality				
Threshold 4.7.1: Project dewatering could result in the migration of potential off-site groundwater contamination towards the project site (Impact HYD-1).	S LTS/M	NI	~S LTS/M	~S LTS/M
Threshold 4.7.2: The increase in water supply demand due to the project could potentially interfere with sustainable management of groundwater in the Santa Rosa Plain Subbasin (Impact HYD-2).	S LTS/M	NI	~S LTS/M	~S LTS/M

Table 5.A: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project (Without/With Mitigation)	No Project Alternative (Without/With Mitigation)	Reduced Development Alternative (Without/With Mitigation)	Reduced Residential Alternative (Without/With Mitigation)
Threshold 4.7.3: The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in manner which would result in substantial erosion or siltation on- or off-site.	LTS	NI	~LTS	~LTS
Threshold 4.7.4: The 100-year storm runoff from the project site could exceed the capacity of proposed stormwater infrastructure and result in flooding on the project site and surrounding roadways (Impact HYD-3).	S LTS/M	NI	~S LTS/M	~S LTS/M
Threshold 4.7.5: The proposed project would not release any on-site pollutants into the environment as the result of flooding, tsunami, or seiche.	LTS	NI	~LTS	~LTS
4.8 Hazards and Hazardous Materials				
Threshold 4.8.1: The proposed project would not create a substantial hazard to the public or the environment due to the release of hazardous materials into the environment as a result of inherent risks involved in the transport, use, disposal, or management of hazardous or potentially hazardous materials by project-related construction and operation activities.	LTS	NI	~LTS	~LTS
Threshold 4.8.2: Demolition or renovation activities may result in the release of polychlorinated biphenyls (PCBs) into the environment (Impact HAZ-1).	S LTS/M	NI	~S LTS/M	~S LTS/M
Threshold 4.8.3: Subsurface hazardous materials may be released into the environment during construction and operation of the project (Impact HAZ-2).	S LTS/M	NI	~S LTS/M	~S LTS/M
Threshold 4.8.4: The proposed project would not create a public health hazard due to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.	LTS	NI	~LTS	~LTS
Threshold 4.8.5: The proposed project would not create a significant hazard to the public or the environment as the result of locating the proposed project or related infrastructure on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.	LTS	NI	~LTS	~LTS
Threshold 4.8.6: The proposed project would not permit development inconsistent with an adopted Comprehensive Airport Land Use Compatibility Plan and thereby result in a safety hazard or excessive noise for people residing or working in the project area due to aircraft operations.	LTS	NI	~LTS	~LTS

Table 5.A: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project (Without/With Mitigation)	No Project Alternative (Without/With Mitigation)	Reduced Development Alternative (Without/With Mitigation)	Reduced Residential Alternative (Without/With Mitigation)
Threshold 4.8.7: The proposed project would not impact implementation of emergency-related activities.	LTS	NI	~LTS	~LTS
4.9 Transportation				
Threshold 4.9.1: The proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	LTS	NI	~LTS	~LTS
Threshold 4.9.2: The proposed project would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b).	LTS	NI	~LTS	~LTS
Threshold 4.9.3: Implementation of the proposed project would worsen an existing hazardous geometric design feature at the driveway 280 feet north of Northgate Drive/Thorndale Drive.	S LTS/M	NI	~S LTS/M	~S LTS/M
Threshold 4.9.4: The proposed project would not result in inadequate emergency access.	LTS	NI	~LTS	~LTS
4.10 Air Quality				
Threshold 4.10.1: The proposed project could conflict with implementation of the San Francisco Bay Area Clean Air Plan (Impact AIR-1).	S LTS/M	NI	<LTS	<LTS
Threshold 4.10.2: Construction of the proposed project would generate fugitive dust (PM _{2.5} and PM ₁₀) emissions (Impact AIR-2).	S LTS/M	NI	<LTS	<LTS
Threshold 4.10.2: Construction of Phase 1 would generate ROG and NO _x emissions in excess of thresholds established by the BAAQMD, resulting in a violation of air quality standards (Impact AIR-3).	S LTS/M	NI	<LTS	<LTS
Threshold 4.10.3: Construction of the proposed project would expose sensitive receptors to substantial pollutant concentrations through exceeding the carcinogenic inhalation health risk threshold (Impact AIR-4).	S LTS/M	NI	<LTS	<LTS
Threshold 4.10.4: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	LTS	NI	~LTS	~LTS
4.11 Greenhouse Gas Emissions				
Threshold 4.10.1: The proposed project would generate GHG emissions, either directly or indirectly, that would have a significant effect on the environment (Impact GHG-1).	SU	NI	<SU	~SU
Threshold 4.10.2: The proposed project would conflict with a State or local GHG reduction plan, policy, or regulation (Impact GHG-2).	SU	NI	<SU	~SU

Table 5.A: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project (Without/With Mitigation)	No Project Alternative (Without/With Mitigation)	Reduced Development Alternative (Without/With Mitigation)	Reduced Residential Alternative (Without/With Mitigation)
4.12 Noise				
Threshold 4.12.1: Construction of the proposed project would result in a significant short-term increase in ambient noise levels in the vicinity of the project site in excess of the thresholds established in the City of San Rafael General Plan or Noise Ordinance (Impact NOI-1).	S LTS/M	NI	S <LTS/M	S <LTS/M
Threshold 4.12.2: Operation period noise levels would exceed the City’s land use compatibility thresholds for future on-site sensitive receptors (Impact NOI-2).	SU	NI	<SU	<SU
Threshold 4.12.3: The proposed project would not expose people residing or working in the area to excessive noise levels associated with proximity to a private airport or public use airport or within and airport land use plan.	LTS	NI	~LTS	~LTS
4.13 Public Services and Recreation				
Threshold 4.13.1: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services: fire protection; police protection; schools; parks; or, other public facilities.	LTS	NI	<LTS	<LTS
Threshold 4.13.2: The proposed project would not result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	LTS	NI	<LTS	<LTS
Threshold 4.13.3: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that would have an adverse physical effect on the environment.	LTS	NI	~LTS	~LTS
4.14 Utilities and Service Systems				
Threshold 4.14.1: The proposed project would generate wastewater that would exceed the capacity of the existing sewer infrastructure that serves the project site (Impact UTL-1).	S LTS/M	NI	S <LTS/M	S <LTS/M
Threshold 4.14.2: The proposed project would not exceed the City of San Rafael’s currently available water supplies and result in insufficient water supplies to serve the proposed project in addition to existing and planned future development within the City during normal, dry, and multiple dry years over the next 20-years, including buildout of the project.	LTS	NI	<LTS	~LTS

Table 5.A: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project (Without/With Mitigation)	No Project Alternative (Without/With Mitigation)	Reduced Development Alternative (Without/With Mitigation)	Reduced Residential Alternative (Without/With Mitigation)
Threshold 4.14.3: The proposed project would not result in insufficient wastewater treatment capacity to serve the project and reasonably foreseeable development over the next 20-years, including buildout of the project.	LTS	NI	<LTS	<LTS
Threshold 4.14.4: The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	LTS	NI	<LTS	<LTS
Threshold 4.14.5: The proposed project would not conflict with federal, State, and local management and reduction statutes and regulations related to solid waste.	LTS	NI	<LTS	<LTS
4.15 Energy				
Threshold 4.15.1: The proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	LTS	NI	<LTS	<LTS
Threshold 4.15.2: The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.	LTS	NI	<LTS	<LTS

Source: Compiled by LSA (2023).

~ = Similar to proposed project
 < = Incrementally less than proposed project
 > = Incrementally greater than proposed project
 LTS = Less than significant
 LTS/M = Less than significant with mitigation

NI = No Impact
 S = Significant
 SU = Significant unavoidable
 SU/M = Significant unavoidable with mitigation