

## 6. Alternatives

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The following chapter is intended to inform the public and decision makers of the feasible alternatives that would avoid or substantially lessen any significant effects of the Project.

### 6.1 INTRODUCTION

#### 6.1.1 PURPOSE AND SCOPE

“There is no ironclad rule governing the nature or scope of the alternatives to be discussed [in an EIR] other than the rule of reason” (CEQA Guidelines Section 15126.6(a)). Under the rule of reason, an EIR need discuss only those alternatives necessary to permit a reasoned choice (CEQA Guidelines Section 15126.6(f)). As mentioned above, an EIR need only contain a “range of reasonable alternatives to the project” which would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant [impacts] of the project” (CEQA Guidelines Section 15126.6(a)).

#### 6.1.2 PROJECT OBJECTIVES

As discussed in Chapter 3, Project Description, of this Draft EIR, the Project Applicant has identified the following objectives for the proposed Project:

- Build a vibrant mixed-use commercial center that will be the pre-eminent shopping and entertainment destination in the region.
- Activate and refresh the existing center with attractive buildings and a combination of landscaping and hardscape improvements.
- Activate the neighborhood by providing Daly City residents and non-residents alike with one-stop shopping, entertainment, dining, medical and hotel options.
- Provide a signature, architecturally significant shopping center that will satisfy the City’s planning objectives and be visually interesting.
- Revitalize the gateway entries into the center and provide safe and efficient circulation around the site.
- Design high-quality indoor and outdoor public amenities for visitors.

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- Create an inviting, people-friendly facility to attract additional patrons and improve customer satisfaction.
- Promote economic vitality for the City through new capital investment on what is currently an under-utilized site.
- Stimulate local economy by creating jobs and providing an expanded tax base.
- Support existing tenants by creating new retail and entertainment areas.

## 6.2 ALTERNATIVES CONSIDERED

CEQA requires that an EIR analyze a “no project” alternative (CEQA Guidelines, Section 15126.6(e)). As such, this alternative means a proposed project would not proceed, the discussion “[sh]ould compare the environmental effects which would occur if the project is approved” (Id. at (e)(3)(B)). CEQA Guidelines also require that the environmentally superior alternative be designated. If the alternative with the least environmental impact is the No Project Alternative, the EIR must designate the next most environmentally superior alternative.

Based on the location, existing uses and proposed objectives of the Project, it was determined that, pursuant to CEQA Guidelines Section 15126.6(a), a reasonable range of alternatives includes only the two alternatives listed below. Other alternatives were considered, but as discussed in Section 6.3, below, they were determined to be infeasible.

The alternatives considered are as follows:

- **No Project Alternative.** Consistent with Section 15126.6(e)(2) of the CEQA Guidelines, under the No Project Alternative, the Project site would remain in its existing condition. Since the commercial buildings could be leased in its current condition, without any further discretionary approval from the City, this alternative assumes operation and re-tenanting of the existing buildings in their current condition, given that Sears’ lease expires by the end of 2014. Additionally, under this alternative, improvements proposed by the Project, such as reconfiguration, remodeling, landscaping, and pedestrian circulation improvements would not occur.
- **Reduced Intensity Alternative.** Under the Reduced Intensity Alternative, the overall intensity of the Project components would be reduced by 25 percent over what is proposed under the Project. Table 6-1 shows the amount of development that could occur under this alternative.

## 6.3 ALTERNATIVES CONSIDERED INFEASIBLE

The following alternatives were considered infeasible and therefore were not further analyzed as alternatives.

- **Off-Site Alternative.** Under the Off-Site Alternative, the Project would be constructed at an off-site location. Due to the nature of the Project, which includes reconfiguring, renovating, and re-tenanting existing buildings, an off-site alternative would be infeasible and would not meet all of the objectives of the Project.

## 6.4 ALTERNATIVES COMPARISON

Table 6-1 presents a comparative summary of the alternatives considered in this analysis. Each alternative is analyzed against the impact factors considered for the proposed Project, according to whether it would have a mitigating or adverse effect. The basis for the determinations presented in the Table 6-1 is further discussed in the next section of this chapter.

**TABLE 6-1 COMPARISON OF THE PROPOSED PROJECT AND ALTERNATIVE BUILDOUT PROJECTIONS**

Alternative	Added Employees	Cinema <sup>c</sup>	Entertain. <sup>d</sup>	Additional Restaurant	Retail (SEQuad.)	Retail (SW Quad.)	5-Story Hotel	Retail (NW Quad.)	Medical Offices	Parking Garage
Proposed Project <sup>a</sup>	985	47,000	70,500	12,000	89,600	78,000	75,000	84,500	65,000	348,000
No Project Alternative	0	0	0	0	0	0	0	0	0	0
Reduced Density/ Intensity Alternative	739	35,250	52,875	9,000	67,200	58,500	56,250	63,375	48,750	261,500

a. Proposed Project numbers represent proposed gross leasable area (GLA), not net GLA. Net GLA can be found in Table 3-2 of Chapter 3, Project Description.

b. Entertainment includes (Dave and Buster’s, Restaurant, and Cinema).

c. Proposed Project numbers reflect only the 47,000-square-foot proposed Cinema Complex (10 screens) and does not include the square footage of the existing 20,000-square-foot fitness center expected to remain.

d. Proposed Project numbers reflect Dave & Buster’s 40,000 square feet proposed GLA, and ancillary retail 30,500 square feet proposed GLA, totaling 70,500 square feet proposed GLA.

Source: Equity One, Inc., PlaceWorks.

## 6.5 NO PROJECT ALTERNATIVE

Under the No Project Alternative, the existing uses and building layout would remain unchanged. As such, the existing 883,000 gross leasable area (GLA) would remain the same and would not include additional 468,600<sup>1</sup> of net new GLA as proposed under the Project. Further, under this alternative, a five-story hotel would not be constructed, nor would medical offices be constructed at the corner of Serramonte and Callan Boulevard, and would not result in the construction of a new parking garage at the west entrance of Macy’s and the north entrance of the proposed Entertainment Building. Additionally, this alternative would not include additional entertainment space such as the Dave & Buster’s and Cinema Complex, or the additional restaurant space adjacent to the east entrance of Macy’s. Under this alternative, there would also not be any public improvements, such as improved landscaping and pedestrian circulation throughout the Project site.

### 6.5.1 AESTHETICS

Under the No Project Alternative, the existing Shopping Center would remain in its current condition. As described in Chapter 3 of this Draft EIR, the Project proposes expansion of existing buildings, including a new entertainment building

<sup>1</sup> Project proposes 521,600 square feet of GLA, however, demolition of -53,000 square feet results in 468,600 square feet of net new GLA.

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for Dave & Buster's and ancillary restaurant and retail use, a cinema complex, a new parking garage adjacent to Macy's, new restaurants, and improvements to the southeast and southwest quadrants of the Project site, as shown in Figure 3-3 of Chapter 3. Further, the Project proposes a new five-story hotel, as well as medical office buildings at the corner of Serramonte and Callan Boulevards. The Project would result in less than significant impacts to aesthetics and would be designed with a number of architectural treatments, changes in plane, and volume. Further, development attached to the existing mall would be designed to blend in with adjacent elevations and with a new color scheme that would be applied to the entire mall for consistency. Under this alternative, none of these components or improvements proposed under the Project would occur and the Project site would remain in its existing condition. Therefore, this alternative would result in similar impacts.

### **6.5.2 AIR QUALITY**

Under the No Project Alternative, there would be no new construction and/or redevelopment of the Shopping Center, and the medical office buildings, hotel, restaurants, and entertainment building would not be constructed; therefore, there would be not be any corresponding air emissions attributed to construction related activities. Further, it is unlikely that vehicle trips would increase above existing conditions as there would be no new or expanded uses. Overall, the vehicle air emissions and air emissions attributed to construction would be lower than the Project. As such, this alternative would result in less severe impacts with regards to air quality.

### **6.5.3 BIOLOGICAL RESOURCES**

Under this alternative, there would be no removal and/or disturbance to existing trees that would occur during construction related activities associated with buildout of the Project. Potential impacts related to biological resources under the Project would include removal of several mature trees. Although the Project would plant replacement trees in accordance with the City's Municipal Code, and require that tree removal and grubbing be performed in compliance with the Migratory Bird Treaty Act and California Fish and Game Code, this alternative would ultimately result in less severe impacts to biological resources because it would not result in the disturbance and/or removal of existing trees.

### **6.5.4 CULTURAL RESOURCES**

The No Project Alternative would not involve any ground disturbance; therefore, would reduce the potential for disturbing archaeological resources and human remains. Although the Project site has been previously disturbed and developed, the potential still remains that not yet discovered cultural resources could be disturbed during construction activities related to the Project. As such, this alternative would result in less severe impacts to cultural resources because it would not result in the potential for ground disturbing activities related to construction activities.

## **6.5.5 GEOLOGY, SOILS, AND SEISMICITY**

Under the No Project Alternative, no grading or excavation would occur on site. As discussed in Chapter 4.5, Geology, Soils, and Seismicity, the Project site is subject to strong ground shaking in the event of a major earthquake as a result of its proximity to the San Andreas Fault. Additionally, the Project would include ground disturbing activities related to construction, primarily at the location of the proposed medical office buildings at Serramonte and Callan Boulevards, where the area is on a steep slope. This alternative would not result in any new development and would likely result in fewer on-site employees and visitors to the Shopping Center. Therefore, the potential for ground shaking and exposure of existing structures and on-site employees and visitors would result in this alternative having less severe impacts than the Project.

## **6.5.6 GREENHOUSE GAS EMISSIONS**

Under the No Project Alternative, the existing Project site would remain unchanged and continue to operate under its current condition. Under this alternative, construction expected under the Project, including the hotel, medical office buildings, restaurants, and parking structure, would not be constructed. This alternative is not expected to bring additional trips as under the Project, nor would new structures be constructed, which would increase greenhouse gas emissions during the operational phase. Therefore, the No Project Alternative would result in less severe impacts.

## **6.5.7 HAZARDS AND HAZARDOUS MATERIALS**

Under this alternative, the Project site would remain unchanged and continue to operate under its current condition. Given that no new construction would occur, existing hazardous materials would remain in use resulting from day-to-day operations that currently exist. Existing activities are typical of those related to the operation of a large shopping mall, including but are not limited to, operation of restaurants, surface parking lots, and other small to large retail establishments. Although the Project would expand and add new buildings, the overall uses at the Project site would remain the same. As such, the overall impacts related to hazards and hazardous materials under this alternative would remain similar to the Project.

## **6.5.8 HYDROLOGY AND WATER QUALITY**

Under the No Project Alternative, the existing Project site would remain unchanged and continue to operate under its current condition. As such, improvements to the storm drain system would not occur and the existing amount of impervious surface area would remain at 100 percent. Under this alternative, there would be no net increase or decrease in impervious surface and as a result, there would be no reduction in groundwater recharge. Additionally, the Project would result in less-than-significant impacts to water quality with the implementation of BMPs in accordance with City and County requirements. Under this alternative, the Project site would continue to operate under its current condition and implementation of BMPs would not occur. Therefore, the No Project Alternative would result in more severe impacts than the proposed Project.

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### 6.5.9 LAND USE AND PLANNING

The No Project Alternative would not physically divide an existing community, because it would remain physically unchanged from its existing condition. Under this alternative, no new development or expansion would occur and the proposed medical office buildings, restaurants, parking structure, and hotel, would not be constructed. As described in Chapter 4.9, Land Use and Planning, the Project site would not have the potential to physically divide an existing community as a result of its unique setting in that it is enclosed by two major freeways (I-280 and Highway 1). Although the No Project Alternative would not result in new construction, given the unique isolated setting of the Project site, this alternative would result in similar impacts related to land use and planning.

### 6.5.10 NOISE

The No Project Alternative would not result in any changes to existing conditions and temporary noise and vibration as a result of construction related activities under the Project would not occur. Therefore, this alternative would result in less severe impacts than the Project.

### 6.5.11 POPULATION AND HOUSING

Under this alternative, the Project site would remain unchanged and continue to operate under its current condition, which does not currently include any housing units given that it is a regional shopping center. As discussed in Chapter 4.11, Population and Housing, in this Draft EIR, the Project does not include construction of residential units, and although new development, such as new construction of medical office buildings, restaurants, hotel, and retail space would result in approximately 985 new employees at buildout, it is not expected to result in any substantial changes to land use patterns or property value trends which could create the potential for unplanned growth. Under this alternative the Project site would continue to operate under its current condition and would not generate any new employees. Therefore, this alternative would result in less severe impacts to the Project.

### 6.5.12 PUBLIC SERVICES AND RECREATION

Under the No Project Alternative, public services, such as parks and recreation, fire protection and police services, and schools would continue to operate under existing conditions. The Project would result in new construction of restaurants, medical office buildings, hotel, and expanded mall, totaling approximately 468,600 square feet of net new space. As such, there would likely be an increase to calls for fire protection, police, and emergency services resulting from the additional employees, visitors, and/or overnight guests of the hotel.

Further, additional daytime visitors to the Shopping Center could result in adjacent parks to be utilized; however, the Project doesn't include a residential component and is not expected to induce substantial population growth which could result in greater impacts to parks.

Overall, given that this alternative would not include any of the new construction or expanded space, the No Project Alternative would result in fewer calls for service and/or impacts to public services which would in turn result in less severe impacts than the Project.

### **6.5.13 TRANSPORTATION AND TRAFFIC**

Under the No Project Alternative, the existing Project site would continue to operate under its current condition and layout. As discussed in Chapter 4.13, Transportation and Traffic, buildout of the Project would result in eight significant and unavoidable impacts due to increased traffic. Under the No Project Alternative, no new development on the site would occur. As such, no new traffic trips would be generated and no traffic impacts as a result of new development on the Project site would occur. Overall impacts to transportation and traffic would be less severe when compared to those of the proposed Project.

### **6.5.14 UTILITIES AND SERVICE SYSTEMS**

Overall, the No Project Alternative would result in less demand for water and wastewater generation. Under this alternative, the Project site would remain unchanged and continue to operate under its current condition, which currently has a gross leasable area (GLA) of approximately 883,000 square feet. The Project would include expansion and new construction, including medical office buildings, hotel, restaurants, and retail space. At buildout, the Project would increase GLA by approximately 468,600 square feet, resulting in a total GLA of approximately 1.35 million square feet. As a result of newly constructed structures and intensification of existing uses, demand for water and wastewater generation would increase. Therefore, this alternative would result in less severe impacts, as it would not increase water and wastewater generation given that it would remain operating under its existing condition.

## **6.6 REDUCED INTENSITY ALTERNATIVE**

A Reduced Density/Intensity Alternative was considered in order to reduce potential impacts to GHG emissions and traffic. Under this alternative, development would occur as described in Chapter 3, Project Description; however, the new entertainment and cinema complex building, retail and restaurant space, hotel, medical office buildings, and parking garage would be reduced by 25 percent, as shown above in Table 6-1.

### **6.6.1 AESTHETICS**

The Reduced Density/Intensity Alternative would reduce overall development in terms of square-footage by 25 percent. The overall type and pattern of development would remain similar to the Project, including the expansion and redevelopment of the shopping area, new medical office buildings at the corner of Serramonte and Callan Boulevards, new restaurant space, a parking garage, and a new hotel. As discussed in Chapter 4.1, Aesthetics, the Project would result in less-than-significant aesthetic impacts. Although a reduction in the overall intensity and density of development would reduce

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the overall amount of square footage developed, the types, locations of development, and general footprint of the Project site would remain similar to the Project. As such, this alternative would result in similar impacts to the Project with respect to aesthetics.

### 6.6.2 AIR QUALITY

Under this alternative, development would still occur similar to the Project but this alternative would result in a 25 percent reduction in the expansion of and new construction of retail and restaurant space, entertainment space, hotel, medical office buildings, and proposed parking garage. The reduction in building square footage and hotel rooms proposed would reduce vehicle trips, mobile-source, and stationary source emissions. Additionally, the reduction in land use development would reduce short-term emissions related to Project construction activities. As discussed in Chapter 4.2, Air Quality, the proposed Project would result in significant impacts to air quality.

This alternative would also result in significant operational phase criteria air pollutant emission impacts, and due to the reduction in square footages proposed, would result in reduced operational-phase emissions as compared to the proposed Project. Likewise, construction-related emissions would be less than those identified for the proposed Project, and with mitigation would be less-than-significant. Therefore, the potential to impact air quality would also be reduced beyond what was considered under the proposed Project.

Although the overall type of development would remain similar to the proposed Project and impacts were found to be less-than-significant, reduced development under this alternative would further reduce long- and short-term pollutant emissions. Therefore, this alternative would result in less severe impacts than the Project.

### 6.6.3 BIOLOGICAL RESOURCES

Under this alternative, development would still occur similar to the Project with the exception of a 25 percent reduction in the square footages proposed. A reduction in intensity and density would reduce the overall amount of hotel rooms and square footages of new structures. However, building footprints would remain the same as under the Project, which would ultimately result in similar areas of ground disturbance, and habitat loss due to trees and landscape being altered throughout buildout. While the overall types and locations of development would still occur as proposed, with the exception of a 25 percent reduction in overall density and intensity, this alternative would result in similar impacts than the Project.

### 6.6.4 CULTURAL RESOURCES

Under this alternative, development would still occur similar to the Project with the exception of a 25 percent reduction in the square footages proposed. A reduction in intensity and density could result in fewer areas of ground disturbance, therefore reducing the potential to disturb any cultural resources that may be present on the Project site that have yet to be discovered. Mitigation measures included in Chapter 4.4, Cultural Resources, would still apply under this alternative;

therefore, potential impacts would be less than significant. Overall, this alternative would result in similar impacts than the proposed Project.

### **6.6.5 GEOLOGY, SOILS, AND SEISMICITY**

Under the Reduced Density/Intensity Alternative, development would still occur similar to the Project with the exception of a 25 percent reduction in the square footage proposed. As discussed in Chapter 4.5, Geology, Soils, and Seismicity, large earthquakes could generate strong to violent ground shaking at the Project site which could result in damage to existing and proposed structures. Additionally, erosion and/or loss of topsoil could result from ground disturbance and excavation from construction activities, however, erosion control measures would be required to minimize erosion. Chapter 4.5 identified less than significant impacts with respect to geology and soils. Although this alternative would result in the same overall type of development proposed under the Project, it would reduce the amount of development by 25 percent, therefore reducing the amount of square footage susceptible to ground shaking. As such, this alternative would result in less severe impacts than the Project.

### **6.6.6 GREENHOUSE GAS EMISSIONS**

Under this alternative, development would still occur similar to the Project with the exception of a 25 percent reduction in the square footage proposed. The reduction in square footage would result in fewer vehicle trips generated upon buildout of the Project, which would reduce the total amount of GHGs emitted. Additionally, GHG emissions from stationary sources and energy usage would be reduced compared to the Project due to the reduction in building square footage.

GHG emissions impacts of the proposed Project are based on BAAQMDs efficiency metric, which is a per capita measure of the GHG emissions impacts of a project. Therefore, due to the reduced scale of development and reduction in employees generated under this alternative which would result in fewer vehicle trips upon buildout, short- and long-term GHG emissions would be less severe than the Project.

### **6.6.7 HAZARDS AND HAZARDOUS MATERIALS**

As discussed in Chapter 4.7, Hazards and Hazardous Materials, the Project would result in less-than-significant impacts. Under this alternative, the same project components would continue to be built as under the Project, with the exception of reducing overall development density and intensity by 25 percent. Although commercially available hazardous materials would be used at various construction sites within the Project site and may generate small amounts of hazardous waste, the waste would be handled in accordance with applicable federal, State, and local laws. Overall, given that this alternative would result in the same overall type of development on the Project site, impacts would be similar to the Project.

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### 6.6.8 HYDROLOGY AND WATER QUALITY

Under the Reduced Density/Intensity Alternative, the same type of development would occur as proposed by the Project, with the exception of a 25 percent reduction in the overall density and intensity of development. As discussed in Chapter 4.8, Hydrology and Water Quality, the proposed Project would result in less than significant impacts to hydrology and water quality. Given that this alternative would reduce the overall amount of development by 25 percent, this alternative would result in a reduction in building square footages. Given that the Project site is previously developed with impervious surfaces, a reduction in the amount of impervious surface would not occur under this alternative. Although the overall type of development would remain similar to the proposed Project and impacts were found to be less than significant, reduced development under this alternative would result in similar impacts to the proposed Project.

### 6.6.9 LAND USE AND PLANNING

Under the Reduced Density/Intensity Alternative, the same type of development would occur on the Project site as proposed by the Project, with the exception of a 25 percent reduction in the overall density and intensity of development. As described in Chapter 4.9, Land Use and Planning, the Project components largely represent intensification of existing uses on the Project site, and would not have the potential to physically divide the site. Further, Project components include circulation improvements that would serve to reduce the potential division of surrounding community. All required entitlements and permits required for the Project would also be required under this alternative. Overall, given this alternative would result in the same type of development as the Project, impacts related to land use and planning would be similar.

### 6.6.10 NOISE

Under the Reduced Density/Intensity Alternative, the same type of development would occur on the Project site as proposed by the Project, with the exception of a 25 percent reduction in the overall density and intensity of development. As discussed in Chapter 4.10, a potentially significant impact would result from the proposed hotel being located in an area that would be exposed to noise levels that are considered “conditionally unacceptable” under the Noise Element of the 2030 General Plan. However, Mitigation Measure NOI-1 in Chapter 4.10 would reduce noise related impact from development of the hotel in proximity to I-280 to a less-than-significant level. Although traffic and employee generation would be reduced as a result of less density and intensity under this alternative, there would still be an increase in permanent ambient noise levels. Overall, this alternative would result in the same type of development as the proposed Project, and impacts related to noise would be similar to the proposed Project.

### 6.6.11 POPULATION AND HOUSING

Under the Reduced Density/Intensity Alternative, the same type of development would occur on the Project site as proposed by the Project, with the exception of a 25 percent reduction in the overall density and intensity of development. As discussed in Chapter 4.11, Population and Housing, in this Draft EIR, the Project does not include construction of

residential units, although new development, such as new construction of medical office buildings, restaurants, hotel, and retail space would result in approximately 985 new employees at buildout, it is not expected to result in any substantial changes to land use patterns which could create the potential for unplanned growth. Given this alternative would reduce the overall amount of development and employee generation, the Reduced Density/Intensity Alternative would further minimize potential impacts to population and housing. As such, this alternative would result in less severe impacts than the Project.

### **6.6.12 PUBLIC SERVICES AND RECREATION**

Under the Reduced Density/Intensity Alternative, the same type of development would occur as the Project, with the exception of a 25 percent reduction in density and intensity of development. As such, this alternative would result in less employee generation than the proposed Project, as well as fewer hotel units, a smaller parking garage, and less square footage of retail, restaurant, entertainment, and medical office buildings, as shown above in Table 6-1. Although this alternative would result in an overall reduction in the amount of development, an increase in the demand for public services, such as fire and police protection, as well as emergency medical services, parks and recreation, and schools would still occur. However, as discussed in Chapter 4.12, Public Services and Recreation, less-than-significant impacts would occur for fire protection and police services, schools, and parks and recreation, considering the proposed Project. Given this alternative would reduce the overall amount of development and employee generation, the Reduced Density/Intensity Alternative would further minimize potential impacts to public services and recreation serving the Project site. As such, this alternative would result in less severe impacts than the proposed Project.

### **6.6.13 TRANSPORTATION AND TRAFFIC**

The Reduced Density/Intensity Alternative would result in the same type of development as the proposed Project, with the exception of a 25 percent reduction in density and intensity of development. Under this alternative, total vehicle trip generation would be reduced over the proposed Project due to a reduction in building square footages for retail and restaurant, entertainment, and medical office buildings, as well as fewer hotel rooms. As discussed in Chapter 4.13, Transportation and Traffic, there would be eight significant and unavoidable impacts resulting from the Project. In general, this alternative would result in the same type of development as the proposed Project and a reduction in trips generated would occur. The 25 percent reduction in density and intensity is not likely to result in a substantial reduction in traffic and transportation impacts given that the overall uses and footprint of the Project would remain the same. However, the reduction in trips generated under this alternative would still result in less severe traffic and transportation impacts compared to the Project.

### **6.6.14 UTILITIES AND SERVICE SYSTEMS**

The Reduced Density/Intensity Alternative would result in the same type of development as the Project, with the exception of a 25 percent reduction in density and intensity of the amount of development. As such, this alternative would reduce the amount of hotel units, square footage of retail, restaurant, entertainment buildings, parking garage space, and

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medical office buildings, thereby reducing the overall impact to utilities and service systems. As discussed in Chapter 4.1, Utilities and Service Systems, the Project would result in a less-than-significant impact to water services, sanitary wastewater, and solid waste. Given that this alternative would reduce the level of development proposed by the Project, impacts to utilities and service systems would be less severe than the Project.

### **6.7 ABILITY TO MEET PROJECT OBJECTIVES**

This section describes how each alternative would meet the Project objectives, described in Chapter 3 of this Draft EIR, and repeated above in Section 6.1.2.

#### **6.7.1 NO PROJECT ALTERNATIVE**

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

#### **6.7.2 REDUCED DENSITY/INTENSITY ALTERNATIVE**

The Reduced Density and Intensity Alternative would meet the objectives. Given that this Alternative would ultimately result in the Project to be constructed as proposed, with the exception of a 25 percent reduction in density and intensity of development, the overall uses and locations of the buildings would not change. As such, this Alternative would continue to meet the objectives.

### **6.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

In addition to the discussion and comparison of impacts of the Project and the alternatives, Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least environmental impact. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets Project objectives.

As shown in Table 6-1, the No Project Alternative would have the fewest environmental impacts as compared to the other alternative, and would therefore be considered the environmentally superior alternative. However, in accordance with State CEQA Guidelines Section 15126.6(e)(2), if the Environmentally Superior Alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the Reduced Density/Intensity Alternative would be the Environmentally Superior Alternative.