

SECTION 6.0 ALTERNATIVES

CEQA requires that an EIR identify alternatives to a project as it is proposed. The CEQA Guidelines specify that the EIR should identify alternatives which “would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.” The purpose of this section is to determine whether there are alternatives of design, scope, or location which would substantially lessen the significant impacts, even if those alternatives “impede to some degree the attainment of the project objectives” or are more expensive (§15126.6).

In order to comply with the purposes of CEQA, it is important to identify alternatives that reduce the significant impacts which are anticipated to occur if the project is implemented, but to try to meet as many of the project’s objectives as possible. The Guidelines emphasize a common sense approach – the alternatives should be reasonable, “foster informed decision making and public participation,” and focus on alternatives that avoid or substantially lessen the significant impacts. The range of alternatives selected for analysis is governed by the “rule of reason” which requires the EIR to discuss only those alternatives necessary to permit a reasoned choice.

The three critical factors to consider in selecting and evaluating alternatives are, therefore: 1) the significant impacts from the proposed project which could be reduced or avoided by an alternative, 2) the project’s objectives, and 3) the feasibility of the alternatives available. Each of these factors is discussed below.

6.1 SIGNIFICANT IMPACTS OF THE PROJECT

As mentioned above, the CEQA Guidelines advise that the alternatives analysis in an EIR should be limited to alternatives that would avoid or substantially lessen any of the significant effects of the project and would achieve most of the project objectives. As discussed throughout *Section 2.0 Environmental Setting, Mitigation, and Impacts* and summarized in *Section 5.0 Significant, Unavoidable Impacts*, the project would result in significant and unavoidable impacts to a freeway segment in the vicinity of the site.

Alternatives may be considered if they would further reduce impacts that are being mitigated to a less than significant level by the project. The proposed project’s impacts that would be significant in the absence of proposed mitigation include air quality (i.e., health risk from Construction TACs and construction-related dust emissions), biological resources (specifically nesting birds, if present), unknown archaeological resources if present on-site, geology and soils (i.e., seismicity, soil erosion), hazardous materials (i.e., contaminated groundwater), and transportation (i.e., intersection impact). The alternatives discussion does not focus on project impacts that are less than significant.

CEQA encourages consideration of an alternative site when impacts of the project might be avoided or substantially lessened. Only locations that would avoid or substantially lessen any of the impacts of the project and meet most of the project objectives need to be considered for inclusion in the EIR.

6.2 OBJECTIVES OF THE PROJECT

While CEQA does not require that alternatives must be capable of meeting all of the project objectives, their ability to meet most of the objectives is considered relevant to their consideration. The City and applicant’s objectives for the project are listed below.

The City’s goals and objectives for the proposed project include the following:

- Ensure the site plan provides minimal disruption to the traffic conditions in area and, where necessary, mitigates all such traffic impacts.
- Ensure that the project site plan results in a highly desirable place for future residents to live, including easy pedestrian circulation within the site and access the Serramonte Shopping Center situated to the north of the project site.
- Provide exemplary project design, as the project will be highly visible.
- Provide expanded lodging, conference, and exhibition space within the City.
- Provide housing on a site identified in the Housing Element to meet the state-mandated Regional Housing Need Allocation for Daly City.
- Foster economic development by providing accommodations for visitors to Daly City.
- Increase revenue for City services through a larger transient occupancy tax (TOT) and expanded tax base.

The project applicant’s objectives for the project are as follows:

- Develop a high-density residential development to assist the City with meeting the goals of their RHNA and General Plan.
- Provide a high-quality hotel within Daly City to supplement the City’s tax base.
- Create a project design that minimizes the need for grading and tree removal on the site.
- Provide additional housing types to diversify the housing mix in the City and provide additional residential development in the Serramonte area to support existing and planned commercial development.
- Provide connectivity for residents and the surrounding community by providing pedestrian connections across the project frontage.

6.3 FEASIBILITY OF ALTERNATIVES

CEQA, the CEQA Guidelines, and case law on the subject have found that feasibility can be based on a wide range of factors and influences. The Guidelines advise that such factors *can* include (but are not necessarily limited to) the suitability of an alternate site, economic viability, availability of infrastructure, consistency with a general plan or with other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent can “reasonably acquire, control or otherwise have access to the alternative site [§15126.6(f)(1)].”

6.4 SELECTION OF ALTERNATIVES

In addition to “No Project,” the CEQA Guidelines advise that the range of alternatives discussed in the EIR should be limited to those that “would avoid or substantially lessen any of the significant effects of the project,” or would further reduce impacts that are considered less than significant with the incorporation of identified mitigation [§15126.6(f)]. For example, the project would result in significant health risks (without implementation of identified mitigation) to existing residences from toxic air contaminant emissions (TACs) from construction equipment and the need for dewatering during construction which may result in water quality impacts. Therefore, an alternative design was considered that reduced the amount of grading required to construct the partially sub-grade parking podiums to reduce construction TAC emissions and the need for dewatering.

The components of these alternatives are described below, followed by a discussion of their impacts and how they would differ from those of the proposed project. A summary of the environmental impacts of the proposed project and the project alternatives is provided in Table 6.5-1.

6.5 PROJECT ALTERNATIVES

The components of the identified alternatives to the proposed project are described below, followed by a discussion of their impacts, relationship to the project objectives, and how they would differ from those of the proposed project.

6.5.1 No Project Alternative – No Development

Description of Alternative

The CEQA Guidelines stipulate that an EIR specifically include a “No Project” alternative. The purpose of including a No Project Alternative is to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project. The Guidelines specifically advise that the “No Project” Alternative is “what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistent with available infrastructure and community services.” The Guidelines emphasize that an EIR should take a practical approach, and not “create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment [Section 15126.6(e)(3)(B)].”

Since the project site is currently undeveloped, the “No Project” alternative includes allowing the site to remain in semi-natural state.

Comparison of Environmental Impacts

Under this alternative, future additional traffic delay to the unsignalized intersection of SR 1 Northbound Ramps and Serramonte Boulevard and to the I-280 southbound weaving segment between SR 1 and Serramonte Boulevard would be avoided. Additional environmental impacts related to project construction such as soil erosion, construction TACs, and fugitive dust would not occur under the No Project Alternative. This alternative would also avoid FAA consultation under Part 77 and would not require issuance of a No Hazard Determination.

Relationship to Project Objectives

The No Project Alternative would not meet any of the project objectives for providing residents a desirable place to live or construct a hotel to expand lodging, conferencing, and exhibition space within the City. The applicant’s objective to provide additional housing types to diversify the housing mix in the City and provide additional residential development in the Serramonte area would not be met by this alternative. The No Project Alternative would not allow for the construction of a high-quality hotel which therefore would not foster economic development within Daly City to supplement the City’s tax base. The existing undeveloped hillside would remain and would further not support additional housing on-site to meet the state-mandated Regional Housing Need Allocation for Daly City.

Conclusion

The No Project Alternative would not meet any of the project objectives but would avoid all of the impacts of the proposed project. For this reason, the No Project Alternative is an environmentally superior alternative to the proposed project.

6.5.2 No Project Alternative – Existing Entitlement

A “No Project” Alternative would also allow for the redevelopment of the site under its existing General Plan land use designations of *High Density Residential* and *Commercial – Retail and Office* in the City’s General Plan. The project site is zoned Planned Development (PD-57). This district is designed to accommodate various types of development such as neighborhood and district shopping centers, professional and administrative areas, single-family and multiple-family residential development, commercial service centers and industrial parks or any other use of combination of uses which can appropriately be made a part of a planned development. Currently, the PD-57 zoning district allows the construction of a 137-room hotel and 200 condominium units with building heights restricted to 90 feet.

Comparison of Environmental Impacts

Under this alternative, the existing entitlement allows the construction of a 137-room hotel and 200 condominium units with building heights up to 90 feet on the site. Due to the restricted heights on the site under the existing entitlement, this alternative would avoid FAA consultation under Part 77 triggered by construction 200 feet above grade and would not require issuance of a No Hazard Determination, therefore reducing airport hazards impacts to a less than significant level. Due to its smaller size and therefore less construction activity, this alternative would reduce impacts related to construction TACs and fugitive dust. Additionally, the No Project Alternative – Existing Entitlement would reduce operational traffic impacts to the SR 1 Northbound Ramps and Serramonte Boulevard intersection and I-280 southbound weaving segment between SR 1 and Serramonte Boulevard; however, not to a less than significant level.

Relationship to Project Objectives

The No Project Alternative – Existing Entitlement would meet many of the project objectives since it would allow for construction of a 137-room hotel and 200 condominium units. Since it is a smaller project than the current project design and would generate less peak hour traffic, this alternative would meet the project objective to ensure the site plan provides minimal disruption to the traffic conditions in the area.

Conclusion

Since the No Project Alternative – Existing Entitlement would provide higher density housing and a hotel on-site, many of the project objectives would be met while avoiding and reducing several environmental impacts. Specifically, the reduced project building heights would ensure airport hazards impacts would be less than significant. This alternative would also reduce impacts related to construction TACs and fugitive dust, although mitigation would still be required to reduce air quality impacts to a less than significant level. Additionally, project-induced operational traffic impacts would be reduced with the No Project Alternative – Existing Entitlement, but not to a less than significant level. However, since this alternative provides less hotel rooms than the current project, this alternative would result in lost economic activity as it would create less revenue for City services through a transient occupancy tax and expanded tax base than the current 176-room hotel design. This alternative, therefore, would result in a corresponding reduction in economic benefits as compared to the proposed project.

6.5.3 Reduced Development Alternative

The Reduced Development Alternative would allow for the same uses as proposed by the project but would reduce the project size to 156 residential units and 116 hotel rooms. The size of the Reduced Development Alternative would avoid impacts to freeway segments on I-280.

Comparison of Environmental Impacts

Under the Reduced Development Alternative, the impact to the I-280 freeway segment would be reduced to a less than significant level. Additionally, this alternative would construct fewer units and therefore put fewer vehicles on roadways, which would proportionally reduce impacts to the SR 1 Northbound Ramps and Serramonte Boulevard intersection. Due to its smaller size and therefore less construction activity, this alternative would proportionally reduce construction TACs and fugitive dust impacts.

Relationship to Project Objectives

The Reduced Development Alternative would meet many of the project objectives since it would allow for construction of 156 residential units and 116 hotel rooms. Implementation of the Reduced Development Alternative would provide expanded lodging, conference, and exhibition space within the City, and create more housing to meet the state-mandated Regional Housing Need Allocation for Daly City. However, since this alternative is reduced in size, potential revenue generated by the hotel would be less than the current project design. Nonetheless, this alternative would foster

economic growth in the City of Daly City by constructing a hotel and would provide additional housing for future residents in the Serramonte area.

Conclusion

The Reduced Development Alternative would reduce the project in size to 156 residential units and 116 hotel rooms thereby avoiding impacts to the I-280 freeway segment. Despite its smaller size, this alternative would support the project’s objective to develop a high-density residential development to assist the City with meeting the goals of their RHNA and General Plan.

6.5.4 Design Alternative

The Design Alternative would reduce the height of the structures by creating all one-bedroom condominium units and eliminating suites at the hotel to avoid any potential impact to airport safety hazards while maintaining the same number of units as currently proposed. Building A would be approximately 193 feet with 11 floors of residential units above the proposed parking podium. Buildings B/C would range from 132 to 177 feet in height above existing grade with nine floors of residential units above the parking podium. The hotel building height would be approximately 195 feet above existing grade with nine floors of hotel rooms above the parking podium. Under the Design Alternative, the heights of the structures would all be reduced to below 200 feet to avoid issuance of a No Hazard Determination by the FAA.

Comparison of Environmental Impacts

Under the Design Alternative, building heights would not exceed 200 feet and therefore the structures would not be subject to FAA consultation under Part 77 and would not require issuance of a No Hazard Determination. The reduced overall building and unit size would reduce operational energy use on the site.

Relationship to Project Objectives

The Design Alternative would meet many of the project objectives since it would maintain the total number of units and hotel rooms on-site. This supports the project’s objective to develop a high-density residential development to assist the City with meeting the goals of their RHNA and General Plan. This alternative would provide a high-quality hotel within Daly City to supplement the City’s tax base. In addition, by reducing the unit and hotel room sizes the operational energy use of the project would also be reduced.

Conclusion

The Design Alternative would reduce building heights below 200 feet thereby omitting the project from FAA consultation under Part 77. This alternative would support the project’s objective to develop a high-density residential development to assist the City with meeting the goals of their RHNA and General Plan.

6.5.5 Location Alternative

The Location Alternative would instead develop the project on the site of the former Serra Bowl and the SamTrans Park & Ride lot site near the Colma BART station at Junipero Serra Boulevard and D Street. The former Serra Bowl site is approximately 3.92 acres and the SamTrans Park & Ride lot is approximately three acres; the two sites are separated by D Street. Therefore, under this alternative, the condominiums would be constructed on the former Serra Bowl Site and the hotel would be constructed on the SamTrans Park & Ride lot.

Comparison of Environmental Impacts

Under the Location Alternative, the former Serra Bowl site and the current SamTrans Park & Ride lot which are in close proximity to BART would reduce traffic impacts to the intersection of SR 1 Northbound Ramps and Serramonte Boulevard. In addition, since both sites are located on a relatively flat surface and not an undeveloped hillside, grading would be reduced and therefore associated construction impacts would be reduced under this alternative.

Relationship to Project Objectives

The Location Alternative would meet many of the project objectives since it would construct high-density housing near transit thereby ensuring the project provides minimal disruption to traffic conditions in the area. Due to the gently sloping and developed sites proposed under the Location Alternative, grading and tree removal would be minimized on the sites. Additionally, this alternative would provide additional housing types to diversify the housing mix in the City and provide additional residential development to support commercial development.

Conclusion

The Location Alternative may reduce the traffic impacts and construction period impacts of the project while meeting the project objectives. However, there is a pending private application on the Serra Bowl site while the SamTrans lot is owned by a public transit agency, and it is not known whether the project applicant could acquire either site to construct the proposed project.

6.6 COMPARISON OF ALTERNATIVES

A comparison of alternatives based upon whether they avoid or substantially lessen any of the significant environmental effects of the project is provided in Table 6.6-1.

Table 6.6-1: Comparison of Impacts from Alternatives to the Project					
Significant Impacts of the Project	Alternatives				
	No Project: No Development	No Project: Current Entitlement	Reduced Development	Design	Location
Construction Impacts (air, noise, hazards)	LTS	Less	Less	Less	Less
Traffic impacts - Freeway - Intersection	LTS LTS	Less Less	LTS Less	Similar Similar	Similar Similar
Airport Hazards	LTS	LTS	LTS	LTS	Similar
Meets Project Objectives?	No	Yes	Yes	Yes	Yes
Environmentally Superior	Yes	No	Yes	No	No
LTS = Less Than Significant Impact Less = Substantial impact reduction compared to the project, but not to a less than significant level					

6.6.1 Environmentally Superior Alternative(s)

The CEQA Guidelines specify that an EIR must identify the environmentally superior alternative among those alternatives discussed. If the environmental superior alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative amongst the other alternatives [Section 15126.6(e)(2)].

Based upon the previous discussion, the environmentally superior alternative would be the No Project Alternative, which would avoid the identified significant impacts. This alternative would not fulfill the project’s basic objectives of providing additional housing types to diversify the housing mix in the City and fostering economic development within Daly City to supplement the City’s tax base. Although the No Project – Existing Entitlement Alternative would also meet some of the project objectives, it would result in significant unavoidable freeway impacts.

Among the other development alternatives that would achieve at least some of the basic project objectives, the Reduced Development Alternative would reduce impacts from the project including reducing freeway impacts to a less than significant level. Implementation of the Reduced Development Alternative would meet the project objectives to some extent as it would provide expanded lodging, conference, and exhibition space within the City, and create more housing to meet the state-mandated Regional Housing Need Allocation for Daly City. The Reduced Development Alternative, therefore, would be the environmentally superior alternative.