# 4 Analysis of Alternatives

The California Environmental Quality Act (CEQA) mandates consideration and analysis of alternatives to the proposed General Plan. According to CEQA Guidelines, the range of alternatives "shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant impacts" (Section 15126(d)(2)). The alternatives may result in new impacts that do not result from the proposed General Plan.

Case law suggests that the discussion of alternatives need not be exhaustive and that alternatives be subject to a construction of reasonableness. The impacts of the alternatives may be discussed "in less detail than the significant effects of the project proposed" (CEQA Guidelines §15126.6(d)). Also, the Guidelines permit analysis of alternatives at a less detailed level for general plans and other program Environmental Impact Reports (EIR), compared to project EIRs. The Guidelines do not specify what would be an adequate level of detail. Quantified information on the alternatives is presented where available; however, in some cases only partial quantification can be provided because of data or analytical limitations.

## 4.1 Background on Development of Alternatives

The planning process that took place to develop the proposed General Plan emphasized a community vision that reflected current and future values. This community vision was developed from an outreach process that included a citywide survey, and workshops that gathered comments from Daly City residents, business owners, and other stakeholders and City officials. The community vision calls for both housing choices and economic development. The alternatives identified in this EIR evaluate land use options for how this vision may be achieved.

## 4.2 Description of Alternatives

This chapter describes and evaluates two alternatives, the Commercial Focused (CF) Alternative and the No Project Alternative, and compares them to the proposed General Plan. The CF Alternative assumes an overall similar amount of development, with more commercial uses rather than residential uses. Consideration of the No Project Alternative is required by CEQA in all EIRs to help decision-makers compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project scenario is based on the City of Daly City 1987 General Plan, which represents the continuation of the existing plans and policies. Table 4.2-1 summarizes buildout of the proposed General Plan, the No Project scenario, and the CF Alternative, with Existing Conditions provided for context.

### COMMERCIAL FOCUSED ALTERNATIVE

The CF Alternative assumes an overall similar amount of development potential as the proposed General Plan. It assumes that future development along major corridors such as Mission Street will be more focused on commercial development compared to the proposed General Plan. The CF Alternative results in 18 fewer housing units and 10,000 square feet more commercial uses when compared to the proposed General Plan. The number of hotel rooms will be the same as the proposed General Plan.

### NO PROJECT ALTERNATIVE

The No Project Alternative assumes continuation of land use development under the 1987 General Plan. The No Project Alternative results in the lowest amount of new development when compared to the proposed General Plan and CF Alternative. The No Project results in 360 fewer housing units and 22,500 square feet less commercial uses when compared to the proposed General Plan. The number of hotel rooms will be the same as the proposed General Plan.

**TABLE 4.2-1: COMPARISON OF ALTERNATIVES AT BUILDOUT**

| | *Existing Conditions* | *No Project* | *Proposed General Plan* | *Commercial Focused Alternative* |
|---|---|---|---|---|
| **Population and Housing** | | | | |
| Housing Units | 31,778 | 33,575 | 33,935 | 33,917 |
| Households[1] | 30,775 | 31,897 | 32,239 | 32,222 |
| Population[2] | 101,123 | 105,259 | 106,388 | 106,331 |
| **Non-Residential Development and Jobs** | | | | |
| Non-Residential (sf) | 7,627,470 | 9,042,230 | 9,064,730 | 9,074,730 |
| Hotel (rooms) | 246 | 883 | 883 | 883 |
| Jobs | 17,656 | 21,601 | 21,646 | 21,651 |

1 Households are estimated as 95 percent of the total housing units, assuming a 5 percent vacancy rate.

2 Buildout population was calculated assuming 3.3 persons per household.

Source: Dyett & Bhatia, 2012; City of Daly City, 2012.

## 4.3 Comparative Impact Analysis

This comparative analysis of alternatives evaluates impacts in the same environmental issue areas analyzed in Chapter 3 of this EIR for the proposed General Plan.

### AESTHETICS

Differences in impacts on visual resources relate primarily to the extent and type of development under each of the alternatives. The proposed General Plan, Commercial Focused Alternative, and No Project Alternative would have similar impacts on visual resources, while the proposed General Plan and Commercial Focus Alternative would provide some environmental benefits.

### Commercial Focus Alternative

This alternative assumes a similar amount of development as the proposed General Plan and would still include policies, standards regarding design compatibility with existing development, and design of the urban realm. In addition, like the proposed General Plan, this Alternative would be subject to General Plan policies regarding scenic views and corridors as well as Zoning Ordinance standards regarding light and glare. Therefore, as with the proposed General Plan, impacts would be less than significant.

### No Project Alternative

This Alternative would not have as much development as the CF Alternative and would result in the lowest amount of development. However, this Alternative would not benefit the visual character of the city to the extent of the proposed General Plan and CF Alternative, as it would not include policies addressing design compatibility, landscaping, or front yard paving. New development under the No Project Alternative would also be subject to General Plan policies regarding scenic views and corridors and Zoning Ordinance standards regarding light and glare, resulting in a less than significant impact.

## AIR QUALITY

Air quality impacts are evaluated on a citywide basis because of the regional, cumulative characteristics of air quality and air pollution patterns. Two of three criteria used in evaluating impacts to air quality are related to goals, policies, and objectives that aim to minimize impacts to air quality, including policies that reflect the Bay Area 2010 Clean Air Plan control measures and policies that minimize impacts of toxic air contaminants on sensitive receptors. The CF Alternative shares these policies but the No Project Alternative does not. The final criterion used in evaluating impacts to air quality is in the comparison of vehicle trips per service population and vehicle miles traveled per service population. Table 4.3-1 presents a comparison of transportation metrics.

**TABLE 4.3-1: COMPARISON OF TRANSPORTATION METRICS**

| *Metric* | *Existing (2008)* | *No Project (2030)* | *Proposed General Plan (2030)* | *CF Alternative (2030)* |
|---|---|---|---|---|
| Service Population (Population + Jobs) | 118,779 | 126,860 | 128,033 | 127,982 |
| Total Daily Vehicle Trips | 627,596 | 678,569 | 682,467 | 682,579 |
| Daily Vehicle Trips Per Capita | 5.3 | 5.3 | 5.3 | 5.3 |
| Total Daily Vehicle Miles Traveled | 1,999,751 | 2,577,085 | 2,582,619 | 2,582,572 |
| Daily Vehicle Miles Traveled Per Capita | 16.8 | 20.3 | 20.2 | 20.2 |

Source: Kittelson & Associates, 2012; Dyett & Bhatia, 2012

### Commercial Focus Alternative

Because policies for the CF Alternative would be the same as policies in the proposed General Plan, impacts are expected to be similar, and less than significant in terms of policy-related impacts.

However, in regards to exposure of potential mobile sources of TAC, the CF Alternative would result in less residential development along major corridors and thus would result in less potential for exposure to mobile sources of TACs.

The CF Alternative results in the same daily vehicle trips per capita as the proposed General Plan, No Project, and Existing scenarios. It results in the same daily vehicle miles traveled per capita as the proposed General Plan which is slightly less than that under the No Project, indicating a less than significant impact.

### No Project Alternative

The No Project Alternative would not include these goals, policies, and objectives of the proposed General Plan and CF Alternative, resulting in a potentially significant impact related to achieving regional air quality goals and protecting public health.

While the No Project Alternative's vehicle trips per capita is the same as the proposed General Plan and the CF Alternative, the daily vehicle miles traveled per capita is slightly higher. The No Project Alternative's vehicle trips per capita is the same as the Existing scenario, indicating a less than significant impact.

## BIOLOGICAL RESOURCES

As the city if fairly built out, there is limited opportunity for growth. Future growth is expected to occur as infill development. The areas in the city that may accommodate future growth are primarily located on either previously developed parcels or undeveloped but highly disturbed areas. The proposed General Plan does not include any development projects for these areas. Future projects will have to submit a development application to the City for review and undergo site specific environmental review. Existing federal, state and local regulations, as well as policies in the proposed General Plan will ensure impacts to candidate, sensitive, or special status species are at less than significant levels.

The proposed General Plan, CF Alternative, and No Project Alternative would have similar impacts on biological resources, while the proposed General Plan and Commercial Focus Alternative would provide some environmental benefits.

### Commercial Focus Alternative

Two undeveloped areas of Daly City, areas within the Coastal Zone and San Bruno Mountain, are the only areas that contain relatively large patches of suitable habitat for special species status. Under the CF Alternative, the two areas will still be designated Retail and Office (C-RO) and Low Density Residential (R-LD) as in the proposed General Plan and No Project, thereby not resulting in any differences in land use impact. Additionally, beneficial policies from the proposed General Plan such as Policy HE-25, which would improve the value of the city for migratory birds, would also be implemented under the CF Alternative. These policies, coupled with existing federal, state, and local regulations for candidate, sensitive, and/or special status species ensure that impacts are less than significant.

### No Project Alternative

The No Project Alternative would not include beneficial policies such as Policy HE-25 and thus would not result in improved value for migratory birds within the city. The land uses for the two areas in the Coastal Zone and San Bruno Mountain will still be designated Retail and Office (C-RO) and Low Density Residential (R-LD) as in the proposed General Plan and CF Alternative, thereby not resulting in any differences in land use impacts. As the No Project Alternative is still subject to existing federal, state, and local regulations for candidate, sensitive, and/or special status species, impacts are less than significant.

## CULTURAL AND HISTORIC RESOURCES

According to the NWIC, there is a high potential for identifying unrecorded Native American and historic-period archeological resources in parts of the city. A records search conducted by the NWIC indicates the presence of seven recorded archaeological resources and two recorded buildings of historic significance in the city. Additionally, the NWIC identified 47 structures that meet the Office of Historic Preservation's minimum age standard (45 years or older) that have potential historic significance. According to the University of California Museum of Paleontology, fossil remains have been recorded within the city at Mussel Rock.

New development allowed under the proposed General Plan has the potential to disrupt undiscovered archeological resources and unrecorded historic resources during project construction. However, existing federal, state and local laws, as well as policies contained in the proposed General Plan would reduce these potential impacts on archeological and historic resources to less than significant levels.

### Commercial Focused Alternative

Like the proposed General Plan, this Alternative would result in less than significant impacts on cultural resources. This Alternative would most likely impact the same sites as the proposed General Plan, so the potential impacts would be the same.

### No Project Alternative

Buildout that would occur under the No Project Alternative would also most likely impact the same sites as the proposed General Plan so the potential impacts would be the same.

## GEOLOGY AND SOILS

Geological, soil, and seismic impacts are citywide in nature, and therefore impact the proposed General Plan, CF Alternative, and No Project Alternative equally. Exposure of people and structures to the rupture of a known earthquake fault and seismic hazards such as ground shaking and liquefaction, and to expansive soils are all mitigated to a less than significant level by State building codes and proposed General Plan policies. The CF and No Project alternatives would provide lesser impacts though due to lesser populations at buildout, thereby exposing fewer people and buildings to these hazards.

### Commercial Focus Alternative

The CF Alternative, with its lower buildout population, will expose fewer people to seismic and unstable/expansive soil hazards, although more than the No Project Alternative. This Alternative would still include policies addressing seismic and geologic hazards, resulting with less than significant impacts, as with the proposed General Plan.

### No Project Alternative

The No Project Alternative, with the lowest buildout population, will expose the least number of people to seismic and unstable/expansive soil hazards. The existing General Plan also includes policies that address seismic and geologic hazards, resulting in less than significant impacts.

## GREENHOUSE GASES AND ENERGY

As in Section 3.6, energy and greenhouse gas impacts for each alternative are evaluated on a city-wide basis. Table 4.3-2 summarizes the comparison of energy use across alternatives. The findings suggest that all alternatives, like the proposed General Plan, have lower overall per service population energy use than existing conditions. All three alternatives reflect a reduction in per service population emissions when compared to existing conditions. This is largely because of the anticipated improvements in fuel efficiency assumed under Pavley rules/new federal café standards.

**TABLE 4.3-2: COMPARISON OF ENERGY USE BY ALTERNATIVE**

| *Alternative* | *GBtu/Year* | *Per Service Population* |
|---|---|---|
| Existing Condition (2005) | 6,191 | 0.052 |
| No Project | 5,406 | 0.043 |
| Proposed General Plan | 5,422 | 0.042 |
| Commercial Focus Alternative | 5,422 | 0.042 |

Source: Dyett & Bhatia, 2012; City of Daly City, 2012.

A comparison of the GHG emissions across alternatives, shown in Table 4.3-3, shows that the proposed General Plan has similar per capita emissions rate as the CF Alternative and slightly lower emission rate per capita than the No Project Alternative. However, all three result in a per capita emission rate that is less than 6.6 $MTCO_2e$.

**TABLE 4.3-3: COMPARISON OF GREENHOUSE GAS EMISSIONS BY ALTERNATIVE**

| | *Existing Conditions* | *No Project* | *Proposed General Plan* | *CF Alternative* |
|---|---|---|---|---|
| Future Service Population | 106,119 | 109,982 | 111,170 | 111,107 |
| Residential | 76,404 | 93,473 | 93,671 | 93,687 |
| Commercial/Industrial | 285,314 | 367,684 | 368,483 | 368,454 |
| Transportation | 87,187 | 93,116 | 93,979 | 93,944 |
| Agriculture | 3 | 3 | 3 | 3 |
| **Total Emissions** | 118,779 | 126,860 | 128,033 | 127,982 |
| Per Service Population | 4.67 | 5.24 | 5.21 | 5.21 |

Source: Dyett & Bhatia, 2012; City of Daly City, 2012.

### Commercial Focus Alternative

The CF Alternative results in the same energy use per service population as the proposed General Plan, but less than that of the No Project. Total emissions under the Commercial Focus alternative is less, compared to total emissions under the proposed General Plan.

### No Project Alternative

As shown in Table 4.3-3, the No Project Alternative will consume the least energy, though essentially the same amount as the CF Alternative, and is marginally more efficient on a per person basis as the proposed General Plan and CF Alternative. The No Project Alternative is better than the proposed General Plan and CF Alternative for total GHG emissions, but not as good for per capita GHG emissions.

## HAZARDS AND HAZARDOUS MATERIALS

The proposed General Plan could create hazards to the public or the environment by facilitating new development in proximity to existing businesses that may handle hazardous materials, and along or near roads where hazardous materials may be transported, and by leading to redevelopment of contaminated sites. These impacts are reduced to less than significant due to existing regulations governing hazardous materials and proposed General Plan policies. Wildland fire risk is present in the northeastern portion of the city. However, proposed General Plan policies will ensure that these areas will be well-serviced by the NCFA, which will result in less than significant impacts.

The CF and No Project alternatives could similarly expose the public and the environment to hazardous materials by bringing new residents, visitors, and jobs in proximity to existing hazardous waste handlers and roads where hazardous wastes could be transported. However, because hazardous materials use and disposal is highly regulated, potential impacts are less than significant. The CF and No Project alternatives could also similarly expose the public to wildland fire risk, but like the proposed General Plan, policies ensure that impacts are less than significant.

### Commercial Focus Alternative

This Alternative would result in less new residential development compared to the proposed General Plan. Thus, there would be a somewhat fewer number of new residents but a few more visitors and businesses that could be potentially exposed to hazardous materials. With regard to clean-up sites, the CF Alternative does not differ from the proposed General Plan, and there would be no difference in the potential impact to new users on redeveloped sites.

### No Project Alternative

The No Project Alternative would carry forward current General Plan land use designations, and would result in less development overall compared to the proposed General Plan, meaning slightly lower potential impacts to new users. With regard to clean-up sites, the No Project Alternative does not differ from the proposed General Plan or CF Alternative and would have to adhere to the same federal and State remediation requirements for clean-up, so impacts are less than significant.

## HYDROLOGY, FLOODING, AND WATER QUALITY

The proposed General Plan could impact storm water discharge rates because new development would add impervious surfaces, generating storm water runoff and associated impacts of soil erosion, and water quality degradation. These impacts are all considered to be less than significant due to existing regulations at the federal, state, and local levels and proposed General Plan policies. Flooding is not considered a significant natural hazard in Daly City and there are no bodies of water in Daly City which pose a threat of seiches. There are no dams or designated tsunami inundation areas within Daly City.

The CF Alternative would result in less new residential development and slightly more commercial development. It could lead to somewhat different potential impacts to water quality and erosion but these impacts are less than significant due to the regulatory structure in place. The No Project Alternative would result in the least amount of impact compared to the proposed General Plan and CF Alternative as it results in the least amount of development.

### Commercial Focused Alternative

This Alternative would result in less residential development compared to the proposed General Plan and slightly more commercial development. However, the overall amount of development would be similar to the proposed General Plan so it could lead to similar potential impacts to water quality and erosion; these impacts are less than significant due to the regulatory structure in place.

### No Project Alternative

This Alternative would result in less development than the proposed General Plan or CF Alternative, resulting in somewhat lower potential impacts with regard to water quality degradation and erosion. Like the proposed General Plan and CF Alternative, impacts are less than significant due to the existing regulatory structure in place.

## LAND USE AND HOUSING

The proposed General Plan and the CF Alternative differ in the amount of residential and non-residential development assumed at buildout. Table 4.2-1 in the preceding section shows the buildout comparison between the alternatives. The proposed General Plan would result in more housing units and less non-residential building area than the CF Alternative, but more than the No Project Alternative.

The proposed General Plan would result in an estimated 33,935 housing units, compared to 33,917 in the CF alternative and 33,575 in No Project. The CF Alternative would provide more capacity for non-residential development than either of the alternatives: approximately 9.075 million square feet compared to 9.065 and 9.042 square feet for the proposed General Plan and No Project Alternative, respectively. None of the alternatives would conflict with the San Bruno Mountain HMP, SFO ALUCP, or land use policies in the California Coastal Act. None of the alternatives would displace substantial numbers of existing housing units or people or divide an established community. None are expected to create any land use incompatibilities that would change the overall character of surrounding neighborhoods.

### Commercial Focus Alternative

This alternative assumes more commercial development along major corridors, which are currently more commercial-focused. The CF Alternative would result in a smaller number of new housing units compared to the proposed General Plan. Like the proposed General Plan, the CF Alternative would result in connections between existing neighborhoods to the east and west, through public realm enhancements, more amenities, and local services.

### No Project Alternative

The No Project Alternative would carry forward the land use designations of the current Daly City General Plan and result in slightly fewer housing units and slightly less commercial development compared to the proposed General Plan and CF Alternative. Though there are very few changes between land uses when comparing the current General Plan and the proposed General Plan, the current General Plan does include an implementation measure to rezone areas in the Coastal Zone to only permit visitor-serving uses desired along the coast, such as hotels and restaurants, while disallowing those uses which are not suitable to serving visitors, which is consistent with the California Coastal Act's prioritization of visitor-serving commercial recreational facilities. The No Project Alternative lacks this measure and therefore is less supportive of the California Coastal Act.

## NOISE

All three scenarios—the proposed General Plan, Commercial Focused Alternative, and No Project Alternative—will result in an increase in noise in the Planning Area due to automobile traffic, overhead airplane departures from SFO, and train traffic on overhead BART tracks under future conditions (General Plan buildout and regional growth). Roadway noise, the largest contributor to noise impacts in Daly City, will increase under each Alternative, although generally less than 3 dB, which is considered inaudible to most humans. Additionally, each Alternative will increase the number of existing sensitive receptors exposed to non-compatible noise levels, which would

represent a significant and unavoidable impact. All three scenarios will be subject to temporary noise impacts from construction.

## Commercial Focus Alternative

Table 4.3-4 shows the noise level increase along major roadways in Daly City for the No Project, proposed General Plan, and CF Alternative. Where present, the differences in noise levels between the three Alternatives are very small—typically 0.1 dB or less. Nevertheless, of the major roadway segments listed in Table 4.3-4, the CF Alternative has the lowest noise levels on four segments as compared to the proposed General Plan and No Project Alternatives. The CF Alternative proposes slightly fewer new housing units than the No Project but slightly more non-residential square footage. Therefore, it is expected to be subject to similar temporary noise impacts from construction as the No Project.

## No Project Alternative

The No Project Alternative is expected to have the least impact on noise as compared to the proposed General Plan and CF Alternative, although the difference is very small. Of the roadway segments listed in Table 4.3-4, the No Project Alternative has the lowest noise levels on six segments as compared to the proposed General Plan and the CF Alternative. Additionally, it would accommodate slightly fewer new housing units and non-residential square footage as the other Alternatives, and as a result, be subject to fewer temporary noise impacts from construction.

**TABLE 4.3-4: EXPECTED INCREASE IN TRAFFIC NOISE LEVELS, 2030 COMPARISON**

| *Roadway* | *Segment* | *No Project DNL dB** | *Proposed Project DNL dB** | *Alternative Project DNL dB** |
|---|---|---|---|---|
| Interstate 280 | North of Hickey Blvd. | 85.72 | 85.72 | 85.72 |
| Interstate 280 | South of Hickey Blvd. | **87.27** | 87.28 | 87.28 |
| Highway 1 | Interstate 280 to Pacifica Border | 82.19 | **82.18** | 82.19 |
| Highway 35 | North of John Daly Blvd. | 75.47 | 75.47 | 75.47 |
| Highway 35 | South of John Daly Blvd. | 74.74 | 74.74 | 74.74 |
| Highway 82/Mission Street | South of John Daly Blvd. | **74.74** | 74.75 | **74.74** |
| Mission Street | North of John Daly Blvd. | 70.29 | 70.29 | **70.24** |
| Geneva Avenue | San Francisco border to Bayshore Blvd. | **75.44** | 75.53 | 75.53 |
| John Daly Boulevard | Highway 35 to Merced Blvd. | **71.21** | 71.29 | 71.29 |

**TABLE 4.3-4: EXPECTED INCREASE IN TRAFFIC NOISE LEVELS, 2030 COMPARISON**

| *Roadway* | *Segment* | *No Project DNL dB** | *Proposed Project DNL dB** | *Alternative Project DNL dB** |
|---|---|---|---|---|
| John Daly Boulevard | Merced Blvd to Interstate 280 | **76.19** | 76.22 | 76.22 |
| John Daly Boulevard | Interstate 280 to De Long St. | 74.36 | 74.36 | **74.35** |
| John Daly Boulevard | east of De Long St. | 71.60 | 71.60 | **71.55** |
| Junipero Serra Boulevard | San Francisco border to Colma border | 72.77 – 75.54 | 72.75 – 75.56 | 72.75 – 75.56 |
| Hickey Boulevard | Callan Blvd. to Colma border | **69.59 – 73.89** | 69.61 – 73.89 | 69.61 – 73.90 |

*Measured at a distance of 50 feet from the roadway centerline.

Source: Charles M. Salter Associates, Inc., 2012

## PUBLIC SERVICES AND FACILITIES

The proposed General Plan will have less than significant impacts on public services because it will not require expansion of fire and police facilities to accommodate additional development. Additionally, implementation of the proposed General Plan will not exceed existing school capacity and future development will have to pay impact fees for schools. The City has a parkland dedication ratio of three acres per 1,000 residents. The proposed General Plan would increase the population by 5,265 which would require approximately 15.8 acres of parkland to meet the ratio.

### Commercial Focus Alternative

The demand for public services is proportional to the amount of new housing units and population in the city. Because the CF Alternative is expected to result in fewer residential units and less population growth, the potential impact on public services and facilities is less. The CF Alternative would increase the population by 5,208 which would require approximately 15.6 acres of parkland, which is less than the proposed General Plan, to meet the city's parkland dedication ratio.

### No Project Alternative

The No Project Alternative is expected to generate the least amount of housing units and population compared to the proposed General Plan and CF Alternative, so its potential impact on public services is less. The No Project Alternative would increase the population by 4,136 which would require 12.4 acres of parkland, which is less than the proposed General Plan and CF Alternative.

## TRAFFIC AND CIRCULATION

The proposed General Plan would increase traffic in Daly City, which would result in a significant and unavoidable LOS impact to a few intersections in the city. The proposed General Plan would

not conflict with San Mateo or San Francisco CMPs, have no impact on air traffic or emergency access, and support bicycle and transit use in the city.

Comparison of the CF and No Project Alternatives to the proposed General Plan is associated with their corresponding amounts of new development. The level of traffic impact associated with development in the city is generally proportional to the level of allowable development as well as type of development. Average daily trip generation therefore varies across the scenario as shown in Table 4.3-5 and 4.3-6.

**TABLE 4.3-5: DAILY VEHICLE TRIPS**

| | | *AM Peak Hour Trips* | | | *PM Peak Hour Trips* | | |
|---|---|---|---|---|---|---|---|
| *Land Use Category* | *Daily Trips* | *In* | *Out* | *Total* | *In* | *Out* | *Total* |
| Existing | 627,596 | 23,872 | 26,979 | 50,851 | 33,519 | 30,412 | 64,003 |
| No Project | 678,569 | 25,859 | 28,364 | 54,223 | 35,646 | 32,968 | 68,686 |
| Proposed General Plan | 682,467 | 25,920 | 28,544 | 54,464 | 35,859 | 33,108 | 69,039 |
| Commercial Focus Alternative | 682,579 | 25,921 | 28,539 | 54,460 | 35,859 | 33,112 | 69,043 |

Source: Kittelson & Associates, Inc., August 2012

**TABLE 4.3-6: INCREASE IN DAILY VEHICLE TRIPS FROM EXISTING**

| | | *AM Peak Hour Trips* | | | *PM Peak Hour Trips* | | |
|---|---|---|---|---|---|---|---|
| *Land Use Category* | *Daily Trips* | *In* | *Out* | *Total* | *In* | *Out* | *Total* |
| No Project | 50,973 | 1,987 | 1,385 | 3,372 | 2,127 | 2,556 | 4,683 |
| Proposed General Plan | 54,871 | 2,048 | 1,565 | 3,613 | 2,340 | 2,696 | 5,036 |
| Commercial Focus Alternative | 54,983 | 2,049 | 1,560 | 3,609 | 2,340 | 2,700 | 5,040 |

Source: Kittelson & Associates, Inc., August 2012

## Commercial Focus Alternative

The CF Alternative assumes 18 fewer housing units as compared to the proposed General Plan but would have 10,000 square feet more commercial uses. With the differences in land use, the CF Alternative would generate 112 more trips on average per day in the city compared to the proposed General Plan. It would generate four fewer AM peak hour trips and four more PM peak hour trips, compared to the proposed General Plan. As shown in Table 4.3-1 in the discussion for Air Quality, the daily vehicle trips per capita service population will be the same as that for Existing, No Project, and the proposed General Plan. Overall, the CF Alternative would result in fewer total daily vehicle miles traveled, increasing by 29.145 percent from existing condition which is a slightly less increase compared to the proposed General Plan, which is increasing vehicle miles traveled by 29.147 percent. The total vehicle miles traveled per capita is overall the same as the proposed General Plan. Based on the trip generation data, implementation of the CF Alternative would likely result in significant impacts at the same intersections as the proposed General Plan. The CF Alternative would similarly support bicycle and transit use in the city.

### No Project

The No Project Alternative results in 360 fewer housing units and 22,500 square feet less commercial uses, compared to the proposed General Plan. With the differences in land use, the No Project Alternative would generate 3,898 fewer trips on average per day in the city compared to the proposed General Plan. It would generate 241 fewer AM peak hour trips and 353 fewer PM peak hour trips, compared to the proposed General Plan. As shown in Table 4.3-1 in the discussion for Air Quality, the daily vehicle trips per capita service population will be the same as that for Existing, No Project, and the proposed General Plan. Overall, the No Project would result in the fewest total daily vehicle miles traveled, but would have a higher per capita compared to the proposed General Plan and No Project. Implementation of the No Project would most likely result in significant impacts at the same intersections as the proposed General Plan. The No Project Alternative would support bicycle and transit use in the city but are not as comprehensive as the proposed General Plan and CF Alternative.

## UTILITIES AND SERVICE SYSTEMS

The 2010 UWMP accommodates the population growth projected under the proposed General Plan. The estimated population and jobs at buildout in the Daly City service area is estimated to be lower than what is projected by the UWMP at 2030. Additionally, water demand from the proposed General Plan is estimated to be lower than supply for the year 2030. The WWTP capacity will be sufficient to treat wastewater generated by new development under the proposed General Plan. The City continues to promote additional waste diversion in the city. Implementation of the proposed General Plan will result in less than significant impacts.

### Commercial Focus Alternative

The demand on utilities and service systems is contingent on the amount of future growth. The CF Alternative will result in fewer housing units but slightly more commercial development. Overall the amount of development is similar to the proposed General Plan so demand on potable water and production of wastewater and waste is similar to the proposed General Plan.

### No Project Alternative

The No Project Alternative will result in the least amount of development compared to the proposed General Plan and the CF Alternative, resulting in less demand on potable water and less production of wastewater and waste.

## IMPACTS NOT POTENTIALLY SIGNIFICANT

The City of Daly City currently does not have any mineral resources, agricultural, or forest resources within the city. Therefore, there will be no impacts with implementation of the proposed General Plan, CF Alternative, and No Project Alternative.

## 4.4 Environmentally Superior Alternative

CEQA Guidelines (Section 15123(e)(2)) require the identification of an environmentally superior alternative among the alternatives analyzed. The No Project Alternative, because of the lower amount of growth and the resulting lessening of adverse impacts, would in many cases, be environmentally superior. However, CEQA Guidelines mandate that if the No Project Alternative is identified as the environmentally superior alternative, then another environmentally superior alternative must be identified.

Based on a comparison of the alternatives' overall environmental impacts and their compatibility with proposed General Plan goals and objectives, the CF Alternative appears to be the environmentally superior alternative for this EIR, though the overall differences between the proposed General Plan (the Project), the No Project and CF Alternatives are slight. The CF Alternative would generate slightly fewer VMT than the proposed General Plan, lead to fewer GHG emissions overall, and have less impact on air quality when compared to the proposed General Plan. Additionally, the CF Alternative would result in fewer housing units as compared to the proposed General Plan and would therefore expose less people to potential seismic and hazard risks. The CF Alternative represents the slightly environmentally superior alternative because it results in fewer impacts while achieving much of the purpose of the proposed General Plan.

Nonetheless, while the CF Alternative represents the environmentally superior alternative, traffic impacts will be significant and unavoidable impacts. While the CF Alternative achieves the goal of economic development and redevelopment along the major corridors, it is less successful in achieving the housing and land use goal in the proposed General Plan. The city's major corridors, such as Mission Street, are already heavily developed with commercial uses. Additional commercial uses without the supportive housing would not result in the creation of vibrant streets with a mix of uses as called for in the proposed General Plan. The Housing and Land Use Goal established by the community calls for diverse housing choices with a good balance between ownership and rental units. As much of Daly City is developed with single-family residential units, which are traditionally ownership units, the development of higher density units would have to occur along these major corridors, which are in turn supported by transit. By focusing on commercial development along major corridors, the CF Alternative is less successful in accommodating long term regional housing needs for Daly City. Additionally, the CF Alternative is not as successful in fostering a mix of uses along Daly City's major corridors by increasing commercial uses. These are the reasons why the CF Alternative was not selected for the project even though it is environmentally superior to the proposed General Plan.

Although the No Project Alternative would create lower numbers of housing and consequently result in fewer vehicles and place a lower demand on utility services than the proposed General Plan, it would not enjoy the benefits of proposed General Plan environmental protection policies. Also, the No Project Alternative does not meet the proposed General Plan goals related to promoting mixed use along the city's major corridors and the transformation of these corridors into vibrant streets with mixed uses and enhanced public improvements. Since new development under the proposed General Plan would be in the form of infill development, each alternative expects development on the same set of sites. Therefore, impacts are no different for many issue areas, including biological resources and cultural and historic resources, and all impacts not considered potentially significant.