CHAPTER 6
Alternatives

6.A Introduction

This chapter presents the alternatives analysis as required by the California Environmental Quality Act (CEQA) for the proposed Balboa Reservoir Project (proposed project). The discussion includes a review of the alternatives analyzed in the Balboa Park Station Area Plan Final Environmental Impact Report (PEIR), followed by the methodology used to select alternatives to the proposed project for detailed CEQA analysis, with the intent of developing potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the proposed project while still meeting most of the project objectives. This chapter identifies a reasonable range of alternatives that meet these criteria, and these alternatives are evaluated for their comparative merits with respect to minimizing adverse environmental effects. For the alternatives selected for detailed analysis, this chapter evaluates the alternatives' impacts against existing environmental conditions and compares the potential impacts of the alternatives with those of the proposed project options. Based on this analysis, this chapter then identifies the environmentally superior alternative. Finally, other alternative concepts that were considered but eliminated from detailed consideration are described along with the reasons for their elimination.

6.A.1 CEQA Requirements for Alternatives Analysis

CEQA Guidelines section 15126.6(a) states that an environmental impact report (EIR) must describe and evaluate a reasonable range of alternatives to the proposed project that would feasibly attain most of the project's basic objectives, but that would avoid or substantially lessen any identified significant adverse environmental effects of the project. An EIR is not required to consider every conceivable alternative to a proposed project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

CEQA, the CEQA Guidelines, and the case law on the subject have found that feasibility can be based on a range of factors and influences. CEQA Guidelines section 15364 defines "feasibility" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." CEQA Guidelines section 15126.6(f)(1) states that the factors that may be taken into account when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context),

and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (if the site is not already owned by the proponent).

- The EIR must evaluate the comparative merits of the alternatives and include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. Specifically, the CEQA Guidelines set forth the following criteria for selecting and evaluating alternatives:
- "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, 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, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible." (CEQA Guidelines section 15126.6(a))
- "[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (CEQA Guidelines section 15126.6(b))
- "The range of potential alternatives shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." (CEQA Guidelines section 15126.6(c))
- "The specific alternative of 'no project' shall also be evaluated along with its impact." (CEQA Guidelines section 15126.6(e)(1))
- "The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making." (CEQA Guidelines section 15126.6(f))

6.A.2 Balboa Park Station Area Plan PEIR Alternatives Analysis

The PEIR identified and analyzed alternatives to the Balboa Park Station Area Plan (area plan). As required under CEQA, the selected alternatives would reduce or avoid identified significant impacts of the area plan as well as meet most of the plan's objectives. The two alternatives analyzed in the PEIR included:

- **No Project Alternative** – assumed that the Planning Department would not adopt and implement the area plan, and no changes proposed under the plan would be made. Existing development would remain and the underused parcels would be expected to be developed over a longer period of time. Under the No Project Alternative, the PEIR assumed that some development would continue to take place within the plan area by 2025 resulting in an

increase of 60 new residents, approximately 27 new residential units, 35,000 square feet of food market and neighborhood-serving retail uses, and a net increase of about 238 jobs.[1]

- **No Transportation Improvements Alternative** – focused on reducing the significant transportation impacts that would occur with implementation of the transportation changes and improvements in the area plan. This alternative would not include seven of the transportation improvements proposed under the area plan.

The PEIR determined that the No Project alternative would avoid impacts on roadways, intersections, and transit operations identified for the plan area, and no significant and unavoidable impacts on historical resources would occur. The PEIR also determined that the No Transportation Improvements alternative would result in fewer impacts on roadways, intersections, and transit operations, and the same significant unavoidable impacts on historical resources. The No Transportation Improvements alternative was identified as the environmentally superior alternative in the PEIR. As a program-level EIR, the PEIR analyzed program-level alternatives that addressed the overall objectives of the plan for the entire plan area, and thus, did not examine specific alternatives for individual sites such as the Balboa Reservoir site. This SEIR, as discussed below, addresses site-specific alternatives for the Balboa Reservoir site.

Organization of This Chapter

This chapter is divided into five main sections. Section 6.A, Introduction, p. 6-1, is this introductory section. Section 6.B, Descriptions of Alternatives Selected for Analysis, p. 6-9, describes the basis for selecting the alternatives analyzed in this SEIR; it reviews the project objectives, summarizes the significant impacts of the project that were identified in SEIR Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, and describes the alternatives screening and selection process. Section 6.C, Alternatives Analysis, p. 6-12, provides a detailed description of each of the selected alternatives; presents the detailed alternatives analysis and evaluates the environmental impacts of each of the alternatives, compared to those of the proposed project and relative to each other; and summarizes their ability to meet the project objectives. Section 6.D, Environmentally Superior Alternative, p. 6-52, identifies the environmentally superior alternative. The last section, Section 6.E, Alternatives Considered but Rejected, p. 6-58, discusses alternative concepts considered but rejected from further study.

6.A.3 Alternatives Selection

This section describes the basis for determining the range of CEQA alternatives and identifies the specific alternatives that are analyzed in this EIR.

Project Objectives

As presented in SEIR Chapter 2, Project Description, the City and County of San Francisco and the SFPUC, as the current owner of the project site, and Reservoir Community Partners LLC, the project sponsor, identified 10 shared objectives associated with the Balboa Reservoir project, and

[1] City and County of San Francisco, *Balboa Park Station Area Plan Final Environmental Impact Report,* December 4, 2008.

one additional objective for the City and SFPUC. The project objectives are reiterated below for use in the identification, selection, and evaluation of alternatives. As noted above, an EIR need only consider alternatives that would feasibly accomplish most of the project's basic objectives.

- Implement the goals of the City's 2014 Public Land for Housing program and the Surplus Public Lands Initiative (Proposition K), passed by the voters in November 2015, by replacing an underused surface parking lot located on surplus public land with a substantial amount of new housing, including a high percentage of affordable housing.
- Implement the objectives and goals of the General Plan Housing Element and of the 2009 Balboa Park Station Area Plan that calls for the development of a mixed-use residential neighborhood on the west reservoir to address the citywide demand for housing.
- Contribute to the City's goal of creating 5,000 housing units each year on a site specifically identified in the general plan for additional housing in close proximity to local and regional public transportation by maximizing the number of housing units in the project.
- Build a high-quality residential community with a wide range of building types and heights, and a range of dwelling unit type and tenure, which will provide new residents with the greatest variety of housing options.
- Build a mixed-income community with a high percentage of affordable units to provide housing options for households at a range of income levels, and by doing so facilitate a neighborhood that fosters personal connections across income ranges.
- Replace the reservoir's abandoned infrastructure with new infrastructure improvements, including new streets and sidewalks, bicycle and pedestrian amenities, pedestrian paseos and multiuse paths, water, sewer and gas/electric utilities, new fire hydrant infrastructure and an extension of the City's Auxiliary Water Supply System (AWSS), and community facilities including one new public park, another major open space, a community center, and a childcare facility.
- Establish pedestrian and bicycle connections from the project site to adjacent neighborhoods including City College of San Francisco, Ocean Avenue, Sunnyside and Westwood Park, and increase and improve pedestrian access to transit connections in the area including Bay Area Rapid Transit (BART), Municipal Railway (Muni) light-rail and bus lines, and Muni's City College Terminal.
- As stated in the City's Balboa Reservoir Request for Proposals, work with City College to address parking needs by identifying alternative parking and transportation solutions.
- Develop a project that is financially feasible and able to support the financial investment that will be required to realize it, including equity and debt return levels that will be required by investors and lenders to finance residential developments, as well as eligibility for required federal, state, regional, and local sources of subsidy for infrastructure and utility construction and affordable housing.

The City and SFPUC have the following additional objective:

- Provide SFPUC's water utility ratepayers with fair market value for this utility land asset as required by the City's Charter and applicable law.

Summary of Significant Impacts

As stated in the CEQA Guidelines section 15126.6(a), alternatives to a project selected for analysis in an EIR must substantially lessen or avoid any of the significant environmental impacts associated with the project. The following summarizes the conclusions for potentially significant and significant impacts identified in SEIR Chapter 3 and Appendix B, Initial Study.

Significant and Unavoidable Impacts

The proposed project was determined to have the following significant and unavoidable impacts, even with implementation of feasible mitigation measures, as described in detail in SEIR Chapter 3.

Transportation and Circulation

- The proposed project's physical changes to Lee Avenue could result in secondary effects if there is a resulting deficit in freight loading supply serving Whole Foods and other nearby uses. These secondary effects could impact existing passenger and freight loading/unloading zones, and may create hazardous conditions or significant delay that may affect transit, other vehicles, bicycles, or people walking. (Impact TR-6)

Noise

- Project construction would cause a substantial temporary or periodic increase in ambient noise levels at noise-sensitive receptors above levels existing without the project. Mitigation including construction noise control measures would lessen the severity of the impact, but not to a less-than-significant level. This impact is significant and unavoidable with mitigation. (Impact NO-1)
- Construction truck traffic would cause a substantial temporary or periodic increase in ambient noise levels along access streets in the project vicinity. Mitigation would substantially reduce the construction truck traffic noise increases; however, given the uncertainty regarding implementation of the mitigation measure, this impact is conservatively considered significant and unavoidable, with mitigation. (Impact NO-2)
- Construction of the proposed project, in combination with construction of other cumulative development, would cause a substantial temporary or periodic increase in ambient noise levels at noise-sensitive receptors, due to overlapping construction activities in proximity receptors, resulting in a significant cumulative impact. The project's contribution to this impact would be cumulatively considerable. Mitigation to implement construction noise control measures would lessen the severity of the impact, but not to a less-than-significant level. (Impact C-NO-1)

Air Quality

- During project construction (including during construction of Phase 2 that overlaps with Phase 1 project operations), the proposed project would generate criteria air pollutants at levels that would violate air quality standards for ROG and NOx, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. Mitigation measures would substantially lessen the severity of the impact; however, due to the unknowns associated with implementing an emission offset program and construction phasing depending on market conditions and other unanticipated factors, this impact is conservatively considered significant and unavoidable, with mitigation.

(Impact AQ-2a and Impact AQ-2b, pp. **Error! Bookmark not defined**. and **Error! Bookmark not defined**., respectively)

- During project construction (including during construction of Phase 2 that overlaps with Phase 1 project operations), the proposed project would generate TACs at levels that would expose either offsite or onsite sensitive receptors to substantial pollutant concentrations. The health risk assessment conducted for the proposed project determined that impacts associated with excess cancer risk at both offsite and onsite receptors would exceed significance thresholds without mitigation. Mitigation measures would reduce the impact on offsite and onsite sensitive receptors. However, due to the unknowns associated with construction phasing depending on market conditions and other unanticipated factors which could result in increases in exposure and health risks, health risks at offsite receptor locations are conservatively assumed to still exceed the significance thresholds, and impacts would therefore be considered significant and unavoidable, with mitigation. (Impact AQ-4, p. **Error! Bookmark not defined**.)
- The proposed project, in combination with reasonably foreseeable future development in the project area, would contribute to cumulative regional air quality impacts and cumulative health risk impacts on sensitive receptors. Mitigation measures would lessen the severity of the impact; however, due to the unknowns associated with implementing an emission offset program and the unknowns associated with construction phasing depending on market conditions and other unanticipated factors which could result in increased exposure and health risks, this impact is conservatively considered significant and unavoidable, with mitigation. (Impacts C-AQ-1 and C-AQ-2)

Significant Impacts Identified in this SEIR and Initial Study

The proposed project was determined to have the following potentially significant impacts, all of which could be mitigated to a less-than-significant level with implementation of identified mitigation measures, as described in detail in SEIR Chapter 3 and Appendix B.

Archeological Resources

- The proposed project could cause a substantial adverse change in the significance of an archeological resource. Mitigation measures to conduct archeological testing, monitoring, data recovery, and reporting, as necessary, would reduce this impact to less than significant. (Impact CR-2, initial study)
- The proposed project could disturb human remains, including those interred outside of dedicated cemeteries. Mitigation measures to conduct testing, monitoring, data recovery, and reporting, as necessary, would reduce this impact to less than significant. (Impact CR-3, initial study)

Tribal Cultural Resources

- The project could result in a substantial adverse change in the significance of a tribal cultural resource as defined in CEQA section 21074. Mitigation measures to conduct archeological testing, monitoring, data recovery, and reporting as necessary as well as a tribal cultural resources interpretive program would reduce this impact to less than significant. (Impact TC-1, initial study)

Noise and Vibration

- Operation of the stationary equipment on the project site could result in a substantial permanent increase in ambient noise levels in the immediate project vicinity, and permanently expose noise-sensitive receptors to noise levels in excess of standards in the San Francisco Noise Ordinance. Mitigation measures to implement noise controls on stationary equipment would reduce this impact to less than significant. (Impact NO-4)

Air Quality

- The proposed project could conflict with implementation of the Bay Area 2017 Clean Air Plan. Mitigation measures to minimize construction emissions, require use of low-VOC architectural coatings, promote use of green consumer products, and implement mobile source control measures to reduce this impact to less than significant. (Impact AQ-5, p. **Error! Bookmark not defined**.)

Paleontological Resources

- The proposed project could directly or indirectly destroy a unique paleontological resource or site. Mitigation measures to conduct paleontological resources and mitigation as required would reduce this impact to less than significant. (Impact GE-6, initial study)

Alternatives Screening and Selection

Alternatives Screening

In accordance with CEQA Guidelines section 15126.6(a), this project-level SEIR examines a reasonable range of alternatives to the proposed project or to the location of the project. An alternative selected for analysis must meet three criteria: (1) the alternative would attain *most* of the project's basic objectives; (2) the alternative would *avoid or substantially lessen* the significant environmental impacts of the proposed project; and (3) the alternative must be potentially *feasible*. An EIR need not consider an alternative whose impact cannot be reasonably ascertained and whose implementation is remote and speculative. Furthermore, an EIR need not consider every conceivable alternative, but must consider a reasonable range of alternatives that will foster informed decision-making and public participation.

Screening Process

The alternatives selection process for the proposed project was focused on identifying strategies that address the significant and unavoidable impacts of the proposed project. In addition, potential alternatives were identified from review of scoping comments received following issuance of the Notice of Preparation. The alternative strategies were then reviewed for their feasibility, and the potentially feasible strategies were then screened for their ability to meet most of the project objectives. This process resulted in the development of the final project alternatives that were determined to represent a reasonable range of alternatives as described and analyzed in this SEIR.

Strategies to Avoid or Lessen Significant Impacts

The significant and unavoidable impacts identified for the proposed project options can be broken down into the following categories with respect to strategies to avoiding or lessening impacts related to:

- secondary operational loading impacts
- noise and air quality effects of construction activities

These strategies were then used to formulate alternatives for analysis in this chapter.

Alternative Strategy to Address Secondary Loading Impacts

The significant and unavoidable transportation impact relates to the extension of Lee Avenue into the project site, and reconfiguration of Lee Avenue between Ocean Avenue and the project site. As described in SEIR Section 3.B, Transportation and Circulation, the proposed project would alter the current status of Lee Avenue as a dead-end street and de facto loading zone for deliveries to the Whole Foods grocery store at 1150 Ocean Avenue and to other nearby retail stores and restaurants. That is, because Lee Avenue between Ocean Avenue and the project site has little traffic other than cars heading to the Whole Foods garage and delivery trucks, trucks often park at the curb along Lee Avenue (despite the presence of "No Parking" signs on both sides of the street) to make deliveries. The curb is also used for passenger pickups and drop-offs. The reconfiguration of Lee Avenue as part of the project to a through street providing access to and from the project site would therefore effectively reduce the supply of on-street loading available to Whole Foods and nearby land uses, notwithstanding the fact that the current loading activity is neither legal nor in compliance with the conditions of approval for the 1150 Ocean Avenue project.

As noted in Chapter 2, Project Description, the proposed project includes the conversion of five metered parking spaces (totaling 105 feet in length) along the Ocean Avenue frontage of 1150 Ocean Avenue to metered loading spaces between the hours of 6 a.m. and 2 p.m., subject to SFMTA approval. Nevertheless, the proposed project's physical changes to Lee Avenue could result in secondary effects if there is a resulting deficit in freight loading supply serving Whole Foods and other nearby uses, including such secondary effects as increased duration of vehicles stopped to load/unload goods if using the converted Ocean Avenue loading spaces, which could also lead to drivers choosing to use the SFPUC easement/truck turnaround or double park on Lee Avenue instead. Vehicles double parking in the reconfigured Lee Avenue travel lanes could then adversely affect traffic and transit operations as well as circulation for people walking and bicycling on Lee Avenue and, potentially, on Ocean Avenue if traffic were to back up from Lee Avenue onto Ocean Avenue. Additionally, Muni service on the K-Ingleside line could be adversely affected if Ocean Avenue traffic were congested by traffic backing up from Lee Avenue and forcing vehicles traveling westbound in the right lane on Ocean Avenue to maneuver around stopped traffic by using the left lane, which is shared by the K-Ingleside light-rail vehicles. This adverse effect on Muni service, along with conflicts with people walking and bicycles, could also result from traffic being delayed on Lee Avenue due to maneuvering of large trucks in and out of the Whole Foods loading dock on Lee Avenue, should Lee Avenue traffic back up onto Ocean Avenue as a result.

Strategies to reduce these operational impacts include reducing the scale of the development or providing an additional point of access to the project site, which would reduce the number of project-generated vehicle trips at the Ocean Avenue/Lee Avenue intersection. Reducing the associated number of project-generated vehicle trips on Lee Avenue would reduce, to some extent, queueing that could occur at the intersection of Ocean and Lee avenues and reduce the effects described above.

Alternative Strategy to Address Construction-Related Impacts

Construction activities would result in significant and unavoidable impacts related to air quality and noise, as well as significant impacts that can be reduced to less than significant with mitigation measures related to archeological resources, previously undiscovered human remains, tribal cultural resources, or paleontological resources. SEIR Section 3.D, Air Quality, identifies mitigation measures for construction air quality and TACs, which include construction emissions minimization and emission offsets program. These measures represent feasible strategies to lessen air quality impacts of the proposed project, although not to a less-than-significant level in all instances. SEIR Section 3.C, Noise, identifies mitigation to reduce construction-related noise impacts, which include construction noise control measures and relocating the access road for truck traffic, although significant effects would still result. The construction-related impacts are associated with the scale and duration of the development. For both air quality and noise, a potential alternative strategy to avoid or lessen construction impacts would be to reduce the scale of the project.

In cases where impacts were determined to be less than significant with mitigation, alternative strategies were not warranted because feasible and effective mitigation measures have been identified for avoiding or substantially lessening those impacts. For example, construction impacts related to the potential to encounter archeological resources, previously undiscovered human remains, tribal cultural resources, or paleontological resources would be mitigated to less than significant with identified mitigation measures. These impacts would occur regardless of the size or scale of the project, and no on-site alternative strategies would reduce or lessen these mitigable effects. These impacts are typically associated with any project that involves grading or excavation activities. For this reason, off-site alternatives, depending on the location, would likely result in the same potential impacts and require the same mitigation measures if grading and excavation were required. Therefore, no alternative strategies are designed to specifically address these impacts.

6.B Descriptions of Alternatives Selected for Analysis

Based on the screening process described above, the following three alternatives were selected for detailed analysis in this SEIR:

- Alternative A: No Project Alternative
- Alternative B: Reduced Density Alternative
- Alternative C: San Ramon Way Access Alternative

These three alternatives were determined to adequately represent the range of potentially feasible alternatives required under CEQA for this project. These alternatives would lessen, and in some cases avoid, significant and unavoidable adverse impacts related to air quality and transportation that were identified for the proposed project. A "no project alternative" is included as Alternative A, as required by CEQA, even though it would not meet the basic project objectives.

Alternatives B and C are potentially feasible options that would meet most of the basic project objectives. Other alternatives considered, but not carried forward for detailed analysis and the reasons they were not carried forward, are described in Section 6.E, p. 6-58.

Table 6-1, Characteristics of Proposed Project and Alternatives, summarizes and compares the characteristics of the proposed project with those of Alternatives A through C. For comparison purposes, **Figures 6-1 through 6-3**, presented in Section 6.C, pp. 6-17, 6-19, and 6-37, respectively, depict the two build alternatives. **Table 6-2, Summary of Ability of Alternatives to Meet Project Objectives**, summarizes the ability of each of the alternatives to meet the project objectives.

Detailed descriptions of each alternative are presented below, including the assumptions used in analyzing their environmental impacts. For each alternative, the descriptions include the land use plan, description of features different from the proposed project options, and construction assumptions.

TABLE 6-1
CHARACTERISTICS OF PROPOSED PROJECT AND ALTERNATIVES

	Proposed Project		Alternatives		
Characteristic	**Developer's Proposed Option**	**Additional Housing Option**	**Alternative A: No Project**	**Alternative B: Reduced Intensity**	**Alternative C: San Ramon Way Access[a]**
Land Use Program					
Residential, dwelling units	1,100	1,550	0	800	1,100–1,550
Residential, gross square feet	1,283,000	1,588,000	0	936,590[b]	1,283,000–1,588,000
Commercial (retail), gross square feet	7,500	7,500	0	7,500	7,500
Community Facilities, gross square feet	10,000	10,000	0	10,000	10,000
Parking, gross square feet	339,900	231,000		143,930[c]	231,000–339,900
Total Building Area	**1,640,400**	**1,836,500**	**0**	**1,098,020**	**1,640,400–1,836,500**
Parking					
Parking, no. of spaces	1,300 [550 residential + 750 public garage]	650 [residential only]	1,007	400 [residential only]	650–1,300
Open Space					
Open Space, acres	4.2	4.2	0	4.2	4.2

Characteristic	Proposed Project		Alternatives		
	Developer's Proposed Option	Additional Housing Option	Alternative A: No Project	Alternative B: Reduced Intensity	Alternative C: San Ramon Way Access[a]
Building Characteristics					
Stories, no.	2 to 7	2 to 8	—	2 to 6	2 to 8
Height, feet	28 to 78	28 to 88	—	28 to 68	28 to 88
Construction					
Start Date	2021	2021	—	2021	2021
End Date	2027	2027	—	2024	2027
Total Duration, years	6	6	—	3.5	6
Construction phases	3	3	—	2	3

SOURCE: ESA, 2019; Van Meter Williams Pollack, 2019

[a] The San Ramon Way Access Alternative could be implemented in conjunction with either the Developer's Proposed Option or the Additional Housing Option. Hence, development intensity is given as a range between that of the two options.

[b] 800 units is approximately 73 percent of the Developer's Proposed Option. Alternative B residential gross square footage is estimated based on the percentage of the Developer's Proposed Option.

[c] Similar to the Additional Housing Option, Alternative B would only provide residential parking. The residential parking for Alternative B was calculated based on the same ratio as the Additional Housing Option (231,000 gsf / 650 spaces = 355.4 gsf/space x 400 Alternative B spaces = 142,160 gsf).

TABLE 6-2
SUMMARY OF ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

Project Objectives	Alternative A: No Project	Alternative B: Reduced Intensity	Alternative C: San Ramon Way Access
	Would the alternative meet this objective?		
Implement the goals of the City's 2014 Public Land for Housing program and the Surplus Public Lands Initiative (Proposition K), passed by the voters in November 2015, by replacing an underused surface parking lot located on surplus public land with a substantial amount of new housing, including a high percentage of affordable housing.	No	Partially due to reduction in residential units (provides 300 and 750 less units than the Developer's Proposed Option and Additional Housing Option, respectively)	Yes
Implement the objectives and goals of the General Plan Housing Element and of the 2009 Balboa Park Station Area Plan that calls for the development of a mixed-use residential neighborhood on the west reservoir to address the citywide demand for housing.	No	Yes	Yes
Contribute to the City's goal of creating 5,000 housing units each year on a site specifically identified in the general plan for additional housing in close proximity to local and regional public transportation by maximizing the number of housing units in the project.	No	Partially due to reduction in residential units	Yes
Build a high-quality residential community with a wide range of building types and heights, and a range of dwelling unit type and tenure, which will provide new residents with the greatest variety of housing options.	No	Partially due to reduction in residential units	Yes

Project Objectives	Alternative A: No Project	Alternative B: Reduced Intensity	Alternative C: San Ramon Way Access
	Would the alternative meet this objective?		
Build a mixed-income community with a high percentage of affordable units to provide housing options for households at a range of income levels, and by doing so facilitate a neighborhood that fosters personal connections across income ranges.	No	Partially due to reduction in residential units	Yes
Replace the reservoir's abandoned infrastructure with new infrastructure improvements, including new streets and sidewalks, bicycle and pedestrian amenities, pedestrian paseos and multiuse paths, water, sewer and gas/electric utilities, new fire hydrant infrastructure and an extension of the City's Auxiliary Water Supply System (AWSS), and community facilities including one new public park, another major open space, a community center, and a childcare facility.	No	Yes	Yes
Establish pedestrian and bicycle connections from the Project site to adjacent neighborhoods including City College of San Francisco, Ocean Avenue, Sunnyside and Westwood Park, and increase and improve pedestrian access to transit connections in the area including Bay Area Rapid Transit (BART), Municipal Railway (Muni) light-rail and bus lines, and Muni's City College Terminal.	No	Yes	Yes
As stated in the City's Balboa Reservoir Request for Proposals, work with City College to address parking needs by identifying parking and transportation solutions.	No	Yes	Yes
Develop a project that is financially feasible and able to support the financial investment that will be required to realize it, including equity and debt return levels that will be required by investors and lenders to finance residential developments, as well as eligibility for required federal, state, regional, and local sources of subsidy for infrastructure and utility construction and affordable housing.	No	Financial feasibility unknown	Yes
The City and SFPUC have the following additional objective: • Provide SFPUC's water utility ratepayers with fair market value for this utility land asset as required by the City's Charter and applicable law.	No	Unknown	Yes

6.C Alternatives Analysis

This section presents the detailed analysis of the impacts of the selected alternatives compared to the proposed project. For each of the three alternatives, this section presents a description of the alternative, assesses the ability of the alternative to meet each of the project objectives, and analyzes the impacts of the alternative compared to those of the proposed project. The impact analysis is based on the same environmental setting and significance thresholds as presented for each resource topic in SEIR Chapter 3 and uses the same approach to analysis. Except as noted, the impact analysis of the alternatives is qualitative, relative to the identified impacts of the

project, and the reader is referred to Chapter 3 and the initial study for the more detailed analysis.

Alternative A: No Project

As required by CEQA Guidelines section 15126.6(e), a no project alternative is evaluated in this SEIR to allow decision-makers to compare the environmental effects of approving the proposed project with the effects of not approving the project. CEQA Guidelines section 15126.6(e)(2) requires that the no project alternative analysis "discuss the existing conditions … as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services." The no project alternative would not preclude development of the site by another project in the future. Currently, there are no other development proposals pending at the project site. Therefore, pursuant to CEQA Guidelines section 15126.6(e)(3)(B), the No Project Alternative for purposes of this analysis is considered "no build" wherein the existing environmental setting is maintained and is "the circumstance in which the project does not proceed." If a development proposal for the project site is submitted in the future that is consistent with the development density established by the area plan for which the PEIR was certified, it would be eligible for streamlined environmental review under CEQA Guidelines section 15183 and California Public Resources section 21083.3.

Description of the No Project Alternative

Under Alternative A, the Balboa Reservoir site would not be developed with either of the proposed project options described in SEIR Chapter 2, or the variants described in SEIR Chapter 5, Variants. Under Alternative A, there would be no change to the existing site circulation. The surface parking lot would not be altered, and the existing 1,007 surface vehicular parking spaces would remain. The project site would be accessed from the North Access Road as under existing conditions. In addition, the Lee Avenue extension, new infrastructure, and streetscape and open space improvements would not be constructed.

The existing development controls on the project site would continue to govern site development and would not be changed. There would be no amendments to the general plan, planning code, or zoning map. No changes related to a new Balboa Reservoir Special Use District or design standards and guidelines would occur. The project site would remain under the existing P (Public) Use District and the 40-X and 65-A Height and Bulk Districts.

Impacts of the No Project Alternative

This environmental analysis assumes that the existing use on the project site would not change and that the existing physical conditions described in SEIR Chapter 3 and in SEIR Appendix B, Initial Study, Section E, Evaluation of Environmental Effects, would remain the same. If Alternative A were to proceed, no changes would be implemented, and none of the impacts associated with the proposed project options or variants, as described in SEIR Chapter 3, SEIR Chapter 5, and initial study Section E, would occur. However, incremental changes would be expected to occur in the vicinity of the project site as nearby reasonably foreseeable cumulative

projects (see Table 3.A-1, Cumulative Projects in the Project Vicinity, p. 3.A-11) are approved, constructed, and occupied. With no change to existing site conditions under Alternative A, land use activity on the project site would not contribute to significant cumulative impacts beyond existing levels.

Noise

Under Alternative A, the project site would continue to be used as an overflow parking lot and site conditions would not change. The significant construction-related noise increases (Impact NO-1), significant construction-related haul truck noise impacts (Impact NO-2), and significant operational noise increases from stationary equipment (Impact NO-4) that would be attributable to the proposed project or project variant would not occur. The mitigation measures identified for the proposed project and project variants (Mitigation Measures M-NO-1, Construction Noise Control Measures, p. **Error! Bookmark not defined.**; M-NO-2, Relocate North Access Road, p. **Error! Bookmark not defined.**; and M-NO-4, Stationary Equipment Noise Controls, p. **Error! Bookmark not defined.**) would not be applicable, as no new construction would occur. Compared to the proposed project options, Alternative A would not have any project-level noise and vibration impacts, and would not contribute to any cumulative impacts related to noise and vibration.

Air Quality

Under Alternative A, the project site would continue to be used as an overflow parking lot and site conditions would not change. The significant construction-related criteria pollutant increases (Impact AQ-2a, p. **Error! Bookmark not defined.**), significant overlapping construction and operational criteria pollutant increases (Impact AQ-2b, p. **Error! Bookmark not defined.**), the significant health risk impact (Impact AQ-4, p. **Error! Bookmark not defined.**), the significant cumulative regional air quality impacts (Impact C-AQ-1, p. **Error! Bookmark not defined.**), and the significant cumulative regional health risk impacts (Impact C-AQ-2, p. **Error! Bookmark not defined.**) that would be attributable to the proposed project would not occur for Alternative A. The mitigation measures identified for the proposed project (Mitigation Measures M-AQ-2a, Construction Emissions Minimization, p. **Error! Bookmark not defined.**; M-AQ-2b, Low-VOC Architectural Coatings, p. **Error! Bookmark not defined.**; M-AQ-2c, Offset Construction and Operational Emissions, p. **Error! Bookmark not defined.**; M-AQ-2d, Diesel Backup Generator Specifications, p. **Error! Bookmark not defined.**; M-AQ-2e, Promote Use of Green Consumer Products, p. **Error! Bookmark not defined.**; and M-AQ-2f, Additional Mobile Source Control Measures, p. **Error! Bookmark not defined.**) would not be applicable, as no new construction or operational activities would occur. Compared to the proposed project, Alternative A would not have any project-level air quality or health risk impacts, and would not contribute to any cumulative impacts related to air quality or health risk.

Transportation and Circulation

Travel Demand and Transportation Network Changes

With existing land uses retained and no changes to the transportation network, transportation and circulation conditions would remain as they are under existing conditions.

Construction Impacts

Alternative A would not generate construction-related truck traffic or worker trips to and from the project site. Therefore, this alternative would not have any construction-related impacts under existing plus project and cumulative conditions.

Operational Impacts

Alternative A would not result in any increases in operations-related travel to and from the project site over existing conditions, and therefore would have less-than-significant project-specific impacts on vehicle miles traveled, traffic hazards, transit, pedestrian or bicycle travel, loading, and emergency vehicle access. Therefore, none of the mitigation measures identified for the Developer's Proposed Option or Additional Housing Option (Mitigation Measure M-TR-6, Monitor Loading Activity and Implement Loading Strategies as Needed, p. **Error! Bookmark not defined**.) would be applicable.

Cumulative Impacts

Alternative A would not contribute to any cumulative impacts on vehicle miles traveled, traffic hazards, transit, pedestrian or bicycle travel, loading, emergency vehicle access, or project-specific construction as none were identified.

Initial Study Topics

The initial study (Appendix B) of this SEIR concluded that the proposed project options and would have no impacts, less-than-significant impacts, or less-than-significant impacts with mitigation in the following analysis areas: land use and land use planning, aesthetics, population and housing, cultural resources, tribal cultural resources, greenhouse gas emissions, wind, shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards/hazardous materials, mineral resources, energy, agriculture and forestry resources, and wildfire.

Alternative A would result in no impacts related to any of these environmental topics, because this alternative would result in no changes to existing site conditions. Because there would be no ground disturbance or new construction at the site under Alternative A, mitigation measures presented in the initial study would not be required under Alternative A.

Ability of the No Project Alternative to Meet Project Objectives

It is assumed that other proposed residential community projects at the site would also not be built under the No Project Alternative, as the project options and other alternatives address differences in residential community density and layout. As shown in Table 6-2, p. 6-11, the No Project Alternative would not meet any of the project objectives. The project site would remain under the existing P (Public) Use District and the 40-X and 65-A Height and Bulk Districts, and no mixed-use residential community would be built at the project site. The reservoir's abandoned infrastructure would not be replaced with new infrastructure improvements. The No Project Alternative would not implement the goals of the City's 2014 Public Land for Housing program, the Surplus Public Lands Initiative, the General Plan Housing Element, or the 2009 Balboa Park Station Area Plan.

Conclusion

Under Alternative A, none of the impacts associated with the proposed project options, as described in Chapter 3 or Appendix B, would occur. The existing surface parking lot would be retained in its current condition; no new buildings, infrastructure, open space, or streetscape improvements would be constructed. There would be no change to existing site circulation. Alternative A would have no significant impacts related to air quality, noise, or transportation and circulation. Therefore, the No Project Alternative would avoid the significant and unavoidable impacts for the proposed project.

Alternative B: Reduced Density Alternative

Alternative B is the Reduced Density Alternative, shown in **Figure 6-1, Alternative B: Reduced Density Alternative Site Plan and Height Ranges (800 Units)**. The purpose of this alternative is to avoid or substantially reduce the significant and unavoidable construction-related impacts on noise and air quality identified in SEIR Chapter 3 for the proposed project options and summarized in Section 6.A.3, Alternatives Selection, p. 6-3.

Figure 6-1 Alternative B: Reduced Density Alternative Site Plan and Height Ranges (800 Units)

Description of the Reduced Density Alternative

Alternative B would be identical to the proposed project options with respect to the land uses, street configurations, and site plan block configurations. Under Alternative B, it is assumed that the site would be developed with approximately 936,590 gross square feet of residential uses (800 dwelling units, or 300 and 750 fewer than the Developer's Proposed Option and Additional Housing Option, respectively). This alternative would include 7,500 gross square feet of retail space and 10,000 gross square feet of childcare and community space, as under both proposed project options. Similar to the Additional Housing Option, Alternative B would not include a public parking garage. There would be approximately 143,930 gross square feet of parking (87,070 and 195,970 gross square feet less than the Additional Housing Option and Developer's Proposed Option, respectively), providing 400 residential parking spaces (250 and 900 fewer than the Additional Housing Option and Developer's Proposed Option, respectively). **Figure 6-2, Alternative B**: **Reduced Density Alternative Parking Facilities and Street Parking Plan**, illustrates the proposed off-street parking locations.

Overall, the total building area would be approximately 542,380 to 738,480 gross square feet less than the amount of development in the Developer's Proposed Option and the Additional Housing Option, respectively. The total building area would be about 66 percent of the Developer's Proposed Option and 59 percent of the Additional Housing Option.

In general, and as shown in Figure 6-1, building heights would be reduced compared to both proposed project options. Building heights on Blocks A through G would be reduced by one story compared to the Developer's Proposed Option and by two stories compared to the Additional Housing Option. Blocks TH1, TH2, and H would remain the same as under the Developer's proposed option, with building heights up to 35 feet. The building heights for Blocks A through G for Alternative B would range in height from 25 to 68 feet.

Similar to the proposed project options, this alternative would include approximately 4 acres of open space. The open spaces and parks would be connected by new internal networks such as pedestrian passages, sidewalks, and roadways. As with the proposed project options, the SFPUC would retain ownership of an 80-foot-wide strip of land located along the southern edge of the site where an underground water transmission pipeline is located.

The transportation and circulation improvements under Alternative B would be identical to those under the proposed project options, including the Lee Avenue extension, interior streets, streetscape improvements, bicycle facilities, and Ocean Avenue streetscape modifications.

Operations of the retail, childcare and community facilities space under Alternative B would be essentially the same as that for both proposed project options. The reduction in the number of residential units under Alternative B would also reduce the number of vehicle, pedestrian, and bicycle trips compared to the proposed project options.

Figure 6-2 Alternative B: Reduced Density Alternative Parking Facilities and Street Parking Plan

Construction

Construction of Alternative B would be similar to the proposed project options, though reduced in both magnitude and duration. In general, the same types of construction activities and equipment would be required. However, construction of Alternative B would take 2.5-years less than the proposed project options. It is anticipated that construction would start in 2021 and be completed in 2024, a 3.5-year construction duration compared to the 6-year duration for the proposed project options. Construction would occur in two phases. Similar to both proposed project options, Phase 0 for Alternative B would include demolition of the west side berm, and north and east embankments, followed by grading, excavation, and construction of site infrastructure over 12 months from 2021 to 2022. One phase (Phase 1) of vertical construction would follow and would include, but not be limited to, finish grading, excavation for subgrade parking, construction of building foundations, building construction, architectural coatings, and paving lasting approximately 24 to 30 months. Like the proposed project, the phasing of project implementation would be subject to changes due to market conditions and other unanticipated factors. Therefore, construction could be accelerated and complete as early as 2023 or extend beyond 2024.

No public parking garage is proposed under Alternative B. Therefore, this alternative would not require 56,000 cubic yards of excavation export under the Developer's Proposed Option. However, similar to the Additional Housing Option, Alternative B would require a net import of 9,000 cubic yards of fill to balance the site.

Impacts of the Reduced Density Alternative

For the purposes of this alternatives analysis, it is assumed that Alternative B would incorporate the same design standards, infrastructure improvements, and transportation management planning assumptions as those under the proposed project options. Impacts of Alternative B would be similar to, or less than those of the proposed project with respect to nearly all resource areas. In all cases, the same mitigation measures identified for the proposed project options would apply to the Reduced Density Alternative. The impacts of the Reduced Density Alternative as compared to those of the proposed project are summarized below by resource topic.

Transportation and Circulation

Travel Demand and Transportation Network Changes

The transportation and circulation changes under Alternative B would be identical to those under the proposed project options, including the Lee Avenue extension, interior streets, streetscape improvements, and bicycle access ways. Alternative B would be identical to the proposed project options with respect to the type of land uses, street configurations, and site plan block configurations. However, under Alternative B, it is assumed that the site would be developed with 800 residential units and 400 vehicle parking spaces for residential use. As with the proposed project options, Alternative B would include 10,000 square feet of childcare space and 7,500 square feet of retail space.

The travel demand for Alternative B was estimated for weekday daily and weekday a.m. and p.m. peak periods assuming the same unit and bedroom mix as with the Developer's Proposed Option and Additional Housing Option. A comparison of the daily vehicle and person-trips of the proposed project options with Alternative B is provided in **Table 6-3, Daily Vehicle and Person-Trips of the Proposed Project Options and Alternative B**.

TABLE 6-3
DAILY VEHICLE AND PERSON-TRIPS OF THE PROPOSED PROJECT OPTIONS AND ALTERNATIVE B

	Vehicle Trips			Person-Trips		
	Daily	A.M. Peak Hour	P.M. Peak Hour	Daily	A.M. Peak Hour	P.M. Peak Hour
Alternative B	2,393	196	248	8,425	655	825
Developer's Proposed Option	3,168	249	318	10,985	828	1,052
Difference	-775 24% reduction	-53 21% reduction	-70 22% reduction	-2,560 23% reduction	-173 21% reduction	-227 22% reduction
Alternative B	2,393	196	248	8,425	655	825
Additional Housing Option	4,442	329	423	14,825	1,088	1,394
Difference	-2,049 46% reduction	-133 40% reduction	-175 41% reduction	-6,400 43% reduction	-433 40% reduction	-569 41% reduction

SOURCE: SF Guidelines, 2019. ITE, 10th Edition, 2017.

Alternative B would generate 8,425 person trips and 2,393 vehicle trips on a daily basis, 655 person trips and 196 vehicle trips during the weekday a.m. peak hour, and 825 person trips and 248 vehicle trips during the weekday p.m. peak hour. Because of its reduced land use program compared to the proposed project and project variant, Alternative B would result in 24, 21, and 22 percent fewer vehicle trips as compared to the Developer's Proposed Option on a daily, weekday a.m. and p.m. peak hour basis, respectively. Additionally, because Alternative B would not include a public parking garage, existing vehicle traffic destined for the existing surface parking located in the west basin (project site) would not be redistributed. Alternative B would result in 46, 40, and 41 percent fewer vehicle trips as compared to the Additional Housing Option on a daily, weekday a.m. and p.m. peak hour basis, respectively.

Construction Impacts

Alternative B would be constructed in two phases over a 3.5-year period. Construction of Alternative B would take 2.5-years less than the proposed project options and would require one less phase of construction. Because of its reduced construction program and shorter duration of construction activities compared to the proposed project options, Alternative B would result in

fewer and less substantial construction effects. As with the proposed project options, Alternative B would also result in a ***less-than-significant*** construction-related transportation impact. PEIR Improvement Measure (Construction) is superseded by the requirements of the blue book regulations, which include the development of a construction management plan and review and approval by the SFMTA and public works to address overall coordination of construction activities, transportation-related circulation, access, and staging.

Operational Impacts

As a result of the reduced land use program and associated reduction in person and vehicle trips generated by Alternative B, Alternative B would result in reduced operational effects compared to those described for the proposed project options and therefore would have ***less-than-significant*** project-specific impacts on vehicle miles traveled, traffic hazards, transit, pedestrian or bicycle travel, loading within the site, and emergency vehicle access.

As with the proposed project, Alternative B would extend Lee Avenue into the project site, altering Lee Avenue's current status as a dead-end street and de facto loading area for passenger pickup and drop-off and freight deliveries. This reconfiguration of Lee Avenue would reduce the supply of on-street loading available to Whole Foods and nearby land uses. Like the project, this alternative would convert five metered parking spaces (105 linear feet) to commercial loading along Ocean Avenue between Lee Avenue and Brighton Avenue. Alternative B would reduce project-generated traffic volumes at the Ocean Avenue/Lee Avenue intersection compared to the proposed project options. Although traffic volumes would be reduced at the Ocean Avenue/Lee Avenue intersection under Alternative B, as with the proposed project options, Alternative B operations would affect existing de facto, if illegal, freight loading activity and passenger loading/unloading, and could create hazardous conditions or significant delay that may affect transit, other vehicles, bicycles, or people walking. Therefore, as with the proposed project options, Alternative B would result in a significant secondary effects with respect to loading, but to a lesser extent. Mitigation Measure M-TR-6, p. **Error! Bookmark not defined.**, would be applicable to Alternative B. However, as discussed under Impact TR-6, p. **Error! Bookmark not defined.**, given the uncertainty regarding the ability of the existing loading demand to be accommodated and the presence of active loading dock management by Whole Foods, as with the proposed project options, Alternative B would result in a ***significant and unavoidable*** impact with respect to loading.

Cumulative Impacts

Alternative B would not contribute to any cumulative impacts on vehicle miles traveled, traffic hazards, pedestrian or bicycle travel, transit, loading, emergency vehicle access, or project-specific construction as none were identified.

Noise

Compared to the proposed project options, under Alternative B, Phase 0 would be the same but less construction activity because of the reduced scale of the buildings.

Construction Noise

The construction program for Alternative B would be generally the same as with the proposed project but this alternative would be constructed in two phases over a 3.5-year period. Construction of Alternative B would take 2.5-years less than the proposed project options and would require one less phase of construction. However, the type of construction equipment and use characteristics would not change because demolition, excavation, and construction activities, even though more limited, would still occur. Thus, the potential to generate substantial temporary noise increases of at least 10 dBA over ambient levels at offsite locations along Ocean Avenue, Plymouth Avenue, and at Archbishop Riordan High School would remain (see Impact NO-1, p. **Error! Bookmark not defined**.), and the noise impacts from these activities under Alternative B would also be significant and unavoidable. Because there would only be one vertical construction phase there would be no future residents exposed to construction noise during operations. Notwithstanding, implementation of Mitigation Measure M-NO-1, p. **Error! Bookmark not defined**., would still be required.

The construction noise reduction strategies identified under Mitigation Measure M-NO-1 would reduce the construction noise impact at off-site and on-site sensitive receptor but, as with the proposed project options, this impact would remain ***significant and unavoidable***.

However, the excavation assumed for the below-grade public parking garage for the Developer's Proposed Option would not occur under Alternative B. Therefore, Alternative B would reduce the number of construction-related truck trips and their associated roadside noise level increases compared to the Developer's Proposed Option. The reduction in haul trips associated with Alternative B would be such that roadside traffic noise levels at the nearby sensitive receptors would not exceed 5 dBA over existing levels along the North Access Road. Therefore, Mitigation Measure M-NO-3, p. **Error! Bookmark not defined**., would not apply to Alternative B and unlike the Developer's Proposed Option, impacts would be ***less than significant***.

Construction Vibration

Under Alternative B, as with the proposed project or project variant, construction activities that generate groundborne vibration would occur, e.g., the use of excavators and vibratory rollers, but existing distances of construction areas from buildings would be sufficient to attenuate vibrations to less than significant levels.

Operational Noise

Stationary Equipment

Under Alternative B, emergency diesel generators that would be required for top building floor heights in excess of 75 feet under the proposed project would not be required for Alternative B because building heights would be below this level. HVAC equipment would still likely be located on the rooftops. As with the proposed project and project variants, Mitigation Measure M-NO-3, p. **Error! Bookmark not defined**., would still be required under Alternative B for rooftop equipment to ensure that proper enclosures or other sound muffling measures would be implemented to meet regulatory requirements established in the Noise Ordinance. Therefore, like

the proposed project or project variant, this impact would be *less than significant with mitigation.*

Traffic Noise

The mix of uses in Alternative B would be the same as the proposed project options. However, as described above under Transportation and Circulation, Alternative B would result in 24 and 46 percent fewer daily vehicle trips compared to the Developer's Proposed Option and Additional Housing Option, respectively. Therefore, the traffic noise increase would be less than the reported traffic noise increases attributable to the proposed project options, and would be less than significant (see Impact NO-4, p. **Error! Bookmark not defined**.).

Land Use Compatibility

Like the proposed project options, Alternative B would result in the introduction of new residential land uses within the same footprint of the site as the proposed project options. Alternative B would have less-than significant noise compatibility impacts related to future noise levels similar to those identified for the proposed project options (see Impact NO-5, p. **Error! Bookmark not defined**.).

Cumulative Impacts

Construction-related cumulative noise and vibration impacts under Alternative B would be similar to those of the proposed project options in combination with noise from construction of other nearby projects of City College during the buildout period for the alternative, and would continue to be less than significant with mitigation (see Impact C-NO-1, p. **Error! Bookmark not defined**.). Under 2040 cumulative conditions with the proposed project options, a traffic noise increase of 3.3 dBA or less was identified resulting in a less-than-significant cumulative noise impact (see Impact C-NO-2, p. **Error! Bookmark not defined**.). Alternative B would result in an in 24 and 46 percent fewer daily vehicle trips compared to the Developer's Proposed Option and Additional Housing Option, respectively, and in combination with forecast cumulative traffic growth in 2040 would not result in an ambient noise increase of over 5 dBA or more. Therefore, cumulative noise impacts with operation of Alternative B would continue to be less than significant.

Air Quality

Air quality impacts of the proposed project options are described in SEIR Section 3.D, Air Quality, and as described below, air quality impacts of the alternatives would be similar.

Construction Impacts: Fugitive Dust Emissions

As with the proposed project, construction activities under Alternative B would be required to comply with the Construction Dust Control Ordinance, and to implement specified dust control measures. Building permits would not be issued without written notification from the Director of Public Health that states that the applicant has a site-specific dust control plan. The Construction Dust Control Ordinance requires the project sponsor and the contractors who are responsible for construction activities to minimize visible dust by: watering all construction areas sufficiently to prevent dust from becoming airborne; providing as much water as necessary to control dust in

any area of land clearing, earth movement, excavation, drillings, and other dust-generating activity; during excavation and earth-moving activities, wet sweeping or vacuuming the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday; covering any inactive stockpiles greater than 10 cubic yards or 500 square feet of excavated materials, and using dust enclosures, curtains, and dust collectors as necessary to control dust in the excavation area. Compliance with the regulations and procedures set forth by the Construction Dust Control Ordinance would ensure that like the proposed project options, potential dust related air quality impacts for Alternative B would be *less than significant*.

Construction Impacts: Criteria Air Pollutant Emissions

As discussed under Impact AQ-2a, p. **Error! Bookmark not defined.**, construction-related emissions of NOx for the Developer's Proposed Option would exceed significance thresholds in 2022 and 2024. Therefore, this would be a significant impact. The exceedances are driven by off-road construction equipment and vendor trucks. For example, in 2024, off-road construction equipment and vendor trips represent approximately 36 and 46 percent of total unmitigated NOx emissions, respectively, for the Developer's Proposed Option. Unlike the proposed project options, project operations would not overlap with construction under Alternative B; therefore, the significant and unavoidable impact identified under Impact AQ-2b would not occur.

Alternative B would require less construction activity than the proposed project given that there would be fewer units to build and smaller building sizes and would be constructed in two phases over a period of 3.5 years instead of three phases over a period of six years for the proposed project. The total building area for Alternative B would be about 66 percent of the Developer's Proposed Option and 59 percent of the Additional Housing Option; therefore, it is anticipated that total construction emissions for Alternative B, including for off-road equipment and vendor trips, would also be less than the emissions for the Developer's Proposed Option and the Additional Housing Option. However, average daily emissions for Alternative B could remain the same as the proposed project options under the shorter 3.5-year construction schedule, although the overall duration of construction would be lesser. In addition, because the construction schedule for the proposed project options could be compressed into as little as three years, a similar compressed construction schedule could ensue with Alternative B and average daily combined construction and operational emissions could increase substantially, compared to those with the currently proposed schedule. This would increase ROG and NOx emissions and further exceedances of the applicable significance criteria. For the proposed project options, it is anticipated that this shortened construction schedule could result in average daily criteria pollutant emissions that are 1.5 to 2.5 times greater than those presented in SEIR Section 3.D, Air Quality. The same reasoning applies to Alternative B; a shortened construction schedule of 1.5-2 years could result in daily criteria pollutant emissions that are 1.5 to 2.5 times greater than would occur under a 3.5-year construction schedule. Consequently, the reduced construction activity for Alternative B could still result in NOx emissions in excess of the thresholds of significance. Thus, all construction-related and operational-related mitigation measures identified for the Developer's Proposed Option would be applicable to Alternative B (i.e., Mitigation Measures M-AQ-2a, Construction Emissions Minimization, p. **Error! Bookmark not defined.**; M-AQ-2b, Low-VOC Architectural Coatings, p. **Error! Bookmark not defined.**; M-AQ-2c, Offset Construction and Operational Emissions, p. **Error! Bookmark not defined.**; M-AQ-2d, Diesel

Backup Generator Specifications, p. **Error! Bookmark not defined.**; M-AQ-2e, Promote Use of Green Consumer Products, p. **Error! Bookmark not defined.**; and M-AQ-2f, Additional Mobile Source Control Measures, p. **Error! Bookmark not defined.**). Similar to the proposed project options, this impact would be ***significant and unavoidable with mitigation***.

Operational Impacts: Criteria Air Pollutant Emissions

For the proposed project options, operational emissions would be below thresholds of significance for all criteria pollutants for both Phase 1 operation in 2024 and full buildout operation in 2027. This is a less-than-significant impact and no mitigation measures are required. Additionally, as discussed under Impact AQ-2b, p. **Error! Bookmark not defined.**, to reduce combined construction plus operational emissions of NOx, Mitigation Measures M-AQ-2c to M-AQ-2f, pp. **Error! Bookmark not defined**. to **Error! Bookmark not defined.**, would reduce operational emissions associated with the proposed project. However, these mitigation measures are not required to reduce operational emissions by themselves to less-than-significant levels.

Alternative B is anticipated to have lower operational emissions than the proposed project, due to reduced energy use associated with fewer units and conditioned floor space, reduced vehicle trips and associated mobile source emissions, reduced area source emission due to lower architectural coating needs and consumer product use, and potentially reduced stationary source emissions due to fewer emergency generators (likely because this alternative would develop shorter buildings than either project option). Because operational emissions for Alternative B are not anticipated to exceed the significance thresholds for any criteria pollutant, mitigation measures are not required to reduce operational emissions. However, mitigation measures have been identified to reduce combined construction plus operational emissions as discussed under Impact AQ-2b, p. **Error! Bookmark not defined.**. Thus, all operational-related mitigation measures identified for the proposed project would be applicable to Alternative B (i.e., Mitigation Measures AQ-2c, Offset Construction and Operational Emissions, p. **Error! Bookmark not defined.**; M-AQ-2d, Diesel Backup Generator Specifications, p. **Error! Bookmark not defined.**; M-AQ-2e, Promote Use of Green Consumer Products, p. **Error! Bookmark not defined.**; and M-AQ-2f, Additional Mobile Source Control Measures, p. **Error! Bookmark not defined.**). With incorporation of these mitigation measures, operational ROG and NOx emissions would be reduced further below the significance thresholds, and this impact would be ***less than significant with mitigation***.

Toxic Air Contaminants, Construction and Operation

Construction and operation of the proposed project would generate toxic air contaminants, including diesel particulate matter, which could expose both offsite and onsite sensitive receptors to a localized health risk. Similar to the proposed project, construction and operation of Alternative B would generate toxic air contaminants, including diesel particulate matter. However, as discussed above, Alternative B would result in only approximately 66 percent of the square footage of development of the Developer's Proposed Option, and the reduction in construction-related diesel particulate matter emissions are expected to roughly correlate with the reduction in square footage. Similarly, Alternative B would generate fewer vehicle trips than the proposed project, and building heights would be reduced to less than 68 feet, which would

eliminate the need for backup diesel generators for all buildings; therefore, Alternative B would result in less operational emissions of diesel particulate matter and $PM_{2.5}$.

As explained in Section 3.D, Air Quality, for both offsite and onsite receptors not in the APEZ, lifetime cancer risk for the proposed project (both options) was found to be less than significant with mitigation, while for offsite receptors already in the APEZ, the unmitigated lifetime cancer risk was found to the less than significant based on modeling; however, because of the potential for a compressed construction schedule, the lifetime cancer risk to off-site receptors already in the APEZ was conservatively judged to be significant and unavoidable. (The compressed construction schedule would not sufficiently increase risk for receptors not currently in the APEZ so as to result in a significant impact after mitigation.)

Given the relative magnitude of development under Alternative B, it is likely that increased cancer risk would be significant in the absence of mitigation. However, with implementation of Mitigation Measures M-AQ-2a, Construction Emissions Minimization, p. **Error! Bookmark not defined.**, and M-AQ-4, Install MERV 13 Filters at the Daycare Facility, p. **Error! Bookmark not defined.**, lifetime cancer risk to offsite and onsite receptors not in the APEZ under Alternative B would be ***less than significant with mitigation.*** With respect to offsite receptors already in the APEZ, lifetime cancer risk under Alternative B would be lower than that of the proposed project options due to less construction activity. However, because the construction schedule may be compressed, potentially increasing the exposure of offsite receptors, impacts related to construction and operational exposure to toxic air contaminants for receptors in the APEZ would be ***significant and unavoidable with mitigation.*** Unlike the proposed project options, Mitigation Measure M-AQ-2b, Diesel Backup Generator Specifications, p. **Error! Bookmark not defined.**, would not be required under this alternative because building heights would be reduced to the extent that backup diesel generators would not be required for any buildings. Annual average $PM_{2.5}$ concentrations would be ***less than significant with mitigation*** (Mitigation Measures M-AQ-2a, Construction Emissions Minimization; M-AQ-2b, Diesel Backup Generator Specifications; and M-AQ-4, Install MERV 13 Filters at the Daycare Facility) for receptors not in the APEZ) and ***less than significant*** (for receptors in the APEZ) for Alternative B, similar to conditions with the project options.

Consistency with Clean Air Plan

Alternative B would be required to comply with the City's Transportation Demand Management (TDM) ordinance, which would require preparation and implementation of a TDM plan. Similar to the proposed project, Alternative B would require additional mitigation measures to ensure consistency with the Clean Air Plan, and with inclusion of such mitigation measures, this impact would be ***less than significant with mitigation.*** In addition to any TDM-related measures, it would be expected that Mitigation Measures M-AQ-2a (Construction Emissions Minimization), M-AQ-2b (Low-VOC Architectural Coatings), M-AQ-2e (Promote Use of Green Consumer Products), M-AQ-2f (Additional Mobile Source Control Measures), and M-AQ-4 (Install MERV 13 Filters at the Daycare Facility), would apply to Alternative B.

Odors

Like the proposed project, Alternative B would not create objectionable odors that would affect a substantial number of people. As described for the project, for Alternative B, construction odors

associated with diesel-powered vehicles and equipment would be temporary and not likely to extend beyond the project site. During operations, small-scale localized odor issues could occur (e.g., near sources such as solid waste collection, food preparation, etc.), but Alternative B would be required to implement odor controls as required by applicable Bay Area Air Quality Management District regulations that place limitations on odorous substances. Therefore, for Alternative B, odor impacts would be *less than significant*.

Cumulative Impacts: Regional Air Quality

No single project by itself would be sufficient in size to result in non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality conditions.[2] However, the project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, because emissions from Alternative B are anticipated to exceed the project-level thresholds as explained above, Alternative B would result in a considerable contribution to cumulative regional air quality impacts, a significant impact. Implementation of Mitigation Measures M-AQ-2a through M AQ 2f, would reduce the severity of this impact; however, because of uncertainties in the implementation of these measures (particularly Mitigation Measure M-AQ-2c), these measures would not reduce the project's contribution to the cumulative impact to a less-than-significant level. Therefore, emissions of criteria air pollutants associated with Alternative B would be cumulatively considerable, and this cumulative impact would be ***significant and unavoidable with mitigation***.

Cumulative Impacts: Health Risk

Alternative B would result in fewer vehicle trips and would not include backup diesel generators, and would, therefore, result in the same cumulative impact determination for $PM_{2.5}$ impact as the proposed project: less than significant with mitigation for all receptors. Additionally, Alternative B would also contribute to a cumulative health risk impact for lifetime cancer risk for offsite and onsite receptors not in the APEZ, but the contribution would be less than significant with implementation of Mitigation Measure M-AQ-2a, Construction Emissions Minimization. However, Alternative B would also contribute to a cumulative health risk impact for lifetime cancer risk for offsite receptors in the APEZ, and the contribution is conservatively considered significant and unavoidable, despite implementation of Mitigation Measure M-AQ-2a. Thus, overall, contribution of Alternative B to the cumulative health risk impact would be ***significant and unavoidable with mitigation***.

Initial Study Topics

Land Use and Land Use Planning

Alternative B would represent a reduced development of the project site. As with the proposed project options, Alternative B would extend a network of pedestrian and bicycle facilities through the project site to adjacent areas, facilitating connectivity with surrounding neighborhoods and

[2] BAAQMD, *CEQA Air Quality Guidelines*, May 2017, p. 2-1.

commercial districts, and would also include the extension of Lee Avenue that would connect to proposed interior streets. For the same reasons as the proposed project options and variants, Alternative B would not present a new physical division of an existing community and would not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect such that a substantial adverse physical change in the environment related to land use would result (see Appendix B, Initial Study, Section E.1, Land Use and Planning, p. B-12).

Aesthetics

Like the proposed project options, Alternative B would be located on an infill site, within a transit priority area, and would include an employment center. Therefore, under CEQA section 21099, aesthetics is not to be considered in determining significant environmental effects of this alternative.

Population and Housing

Like the proposed project, construction of Alternative B would not induce substantial population growth, because project construction workers would likely be drawn from the local and regional construction work force. The magnitude and duration of construction would be less than that of the proposed project options, and for the same reasons described in Appendix B, Initial Study, Section E.3, Population and Housing, p. B-17, construction workers would likely be drawn from the local and regional construction work force such that none of the alternatives would induce population growth by attracting a substantial number of construction workers from outside of the region. Like the proposed project options and variants, construction under Alternative B would not create demand for additional housing or other facilities and services associated with growth, and the growth-inducing impact of construction of any of the alternatives would be ***less than significant***.

Under Alternative B, the residential population within the project site would be reduced compared to the proposed project options, and would have the same retail and childcare facility/community space. Alternative B would introduce 1,840 residents3 to the site (690 and 1,725 fewer residents than the Developer's Proposed Option and Additional Housing Option, respectively). This alternative would generate an estimated 30 jobs, similar to both proposed project options. Similar to the proposed project options, the operation of Alternative B would not induce substantial unplanned population growth in the area, either directly or indirectly. The proposed development plan for Alternative B would be less than that of the proposed project options, such that residential population growth or employment growth generated by the alternative would be the same as or less than that of the proposed project, and this growth would be consistent with the City's and regional plans for growth in the area. The PEIR estimated that implementation of the area plan would result in a net increase of 1,780 residential units; approximately 482 residential units have been or are being built in the area, excluding the proposed project. Alternative B proposes 800 residential units, which including other development in the plan area would be within the planned population growth of the area. Therefore, like the proposed project, the operational growth-

[3] Based on ABAG's persons per household rate of 2.30 (800 units x 2.3 persons per household = 1,840 residents).

inducing impacts of Alternative B, at both a project and cumulative level, would be ***less than significant***.

Alternative B would not displace existing housing or substantial numbers of people because the project site is currently a mostly vacant industrial site which does not include residential uses. Therefore, like the proposed project, there would be ***no impact*** on housing or population displacement for Alternative B.

Cultural Resources

Alternative B would not include a below-grade public parking garage as under the Developer's Proposed Option, resulting in less excavation. However, Alternative B would still require excavation and ground disturbing activities similar to the Additional Housing Option for the residential parking. The potential impacts related to archeological resources and human remains would be substantially the same as those described for the proposed project options because the ground disturbing activities would be required for construction of Alternative B. However, implementation of Mitigation Measures M-CR-2, Accidental Discovery of Archeological Resources (PEIR Mitigation Measure AM-1), and M-CR-3, Accidental Discovery of Human Remains, would (1) ensure that work adhere to the appropriate procedures and protocols to identify and appropriately treat archeological resources discovered during construction activities; and (2) require that proper procedures are followed to ensure appropriate treatment of any buried human remains and associated or unassociated funerary objects if discovered during project construction. Therefore, for Alternative B, impacts on archeological resources and human remains would be ***less than significant with mitigation***, the same as the proposed project options and the same mitigation measures would apply to this Alternative.

As with the proposed project options, Alternative B would have ***no impact*** on a potential historic district.

Tribal Cultural Resources

Alternative B would require excavation and ground disturbing activities similar to the Additional Housing Option for the residential parking. The potential impacts related to tribal cultural resources would be substantially the same as those described for the proposed project options because ground disturbing activities would be required for construction of Alternative B. However, implementation of Mitigation Measure M-TC-1, Tribal Cultural Resources Interpretive Program would reduce potential adverse effects on tribal cultural resources by requiring either preservation-in-place of the tribal cultural resources, if determined effective and feasible, or an interpretive program regarding the tribal cultural resources developed in consultation with affiliated Native American tribal representatives. Therefore, for Alternative B, impacts on tribal cultural resources would be ***less than significant with mitigation***, the same as for the proposed project options and the same mitigation measure would apply to this Alternative.

Greenhouse Gas Emissions

Alternative B would include approximately 34 and 41 percent less building area than the Developer's Proposed Option and Additional Housing Option, respectively), and construction magnitude and duration would consequently decrease. Therefore, Alternative B would result in

fewer construction and operation-related greenhouse gas emissions compared to the proposed project options. Compliance with applicable regulations and requirements that reduce GHG emissions would ensure that Alternative B would be consistent with the City's GHG reduction strategy as well as regional and state plans related to GHG emissions reduction efforts (see Appendix B, Initial Study, Section E.9, Greenhouse Gas Emissions, p. B-36). Thus, as with the proposed project options, cumulative impacts related to GHG emissions would be *less than significant*.

Wind

Under Alternative B, in general, building heights would be reduced compared to both proposed project options, ranging from 25 to 68 feet on Blocks A through G and up to 35 feet on Blocks TH1, TH2, and H. Building heights on Blocks A through G would therefore be 10 feet shorter than the Developer's Proposed Option and 20 feet shorter than the Additional Housing Option. The site plan and building footprints for Alternative B would be the same as both proposed project options.

Under Alternative B, wind conditions along the existing and proposed publicly accessible areas of substantial pedestrian use would be altered similar to the proposed project options. Alternative B building heights would step up in height from west to east, away from the prevailing wind, similar to the proposed project options; therefore, similar to the proposed project options, Alternative B would not result in large building masses extending substantially above the heights of adjacent upwind buildings. In combination with cumulative projects, Alternative B would not result in adverse wind effects because the alternative would reduce the height by which cumulative projects to the east project above their surroundings, same as the proposed project options. As with the proposed project options, wind impacts under Alternative B would be *less than significant* and would not combine with other cumulative projects in the vicinity to generate a significant cumulative impact related to wind.

Shadow

As noted above, under Alternative B, building locations and orientations would remain the same as the proposed project options, but building heights would be the same as or lower. Therefore, Alternative B would cast shorter shadows than the proposed project options, in the same locations as evaluated in Appendix B, Initial Study, Section E.11, Shadow, p. 44, and project-level and cumulative impacts would be *less than significant*.

Recreation

Alternative B would include the same approximately 4 acres of open space as the proposed project options. This alternative would introduce 800 residential units, and approximately 1,840 residents to the site 690 and 1,725 fewer residents than the Developer's Proposed Option and Additional Housing Option, respectively). Therefore, Alternative B would generate less demand for recreational resources compared to the proposed project options. Like the proposed project options, which would have less-than-significant recreation impacts as described in Appendix B, Initial Study, Section E.12, Recreation, p. B-50, this alternative would not increase the use of recreational facilities thereby accelerating physical deterioration of the facilities and would not require construction of new or expanded recreational facilities not already planned. Alternative B

project-level and cumulative recreation impacts would be similar to and reduced compared to impacts of the proposed project options, and would be *less than significant*.

Utilities and Service Systems

Alternative B would introduce fewer residents than the proposed project options and the same number of employees. Similar to the proposed project options, development under Alternative B would comply with the requirements of the City's Stormwater Management Ordinance, and stormwater flows to the combined sewer system would be reduced by 25 percent. With this reduction in residents, water and wastewater demand under this alternative would be less than evaluated under either proposed project option. Because wastewater flows would be less than under the proposed project options, they would remain within the capacity of the Oceanside Water Pollution Control Plant. Like the proposed project options, compliance with local ordinances would limit impacts on landfills. Therefore, project-level impacts on utilities and service systems would be less than the proposed project options, and *less than significant*. Similarly, Alternative B would not combine with other cumulative projects in the vicinity and at the citywide level to generate a significant cumulative impact related to utilities and service systems.

Public Services

Alternative B would have fewer residents than either of the proposed project options, resulting in a reduced demand for public services. Alternative B's growth would be the less than that of the proposed project, and this growth would be consistent with the City's and regional plans for growth in the area. Like the proposed project options, Alternative B's incremental increase in demand for public services would be funded largely through project-related increases to the city's tax base, and would not be substantial given the overall demand for such services on a citywide basis. Alternative B would be required to comply with applicable building and safety codes, and growth generated by Alternative B would be within the existing capacity of public service systems (such as schools and libraries). Alternative B would have *less-than-significant* project-level impacts, and would not combine with cumulative projects in the vicinity and at the citywide level to generate a significant cumulative impact related to public services (see Appendix B, Initial Study, Section E.14, Public Services, p. B-67).

Biological Resources

Alternative B would result in the same area of ground disturbance at the project site, and in the same construction footprint, as both of the proposed project options. Therefore, Alternative B would result in similar impacts on biological resources because the same areas, including trees and other vegetation, would be removed. Like the proposed project, Alternative B would comply with existing regulations that are protective of native resident or migratory wildlife species. Therefore, for similar reasons as discussed in Appendix B, Initial Study, Section E.15, Biological Resources, p. B-79, project-level and cumulative impacts of Alternative B on biological resources would be *less than significant*.

Geology and Soils

Alternative B would involve the same development footprint as both proposed project options and similar amounts of excavation and ground disturbance compared to the Additional Housing Option. As with the proposed project options, Alternative B would require implementation of Mitigation Measure M-GE-6 to address inadvertent discovery of paleontological resources (refer to Appendix B). Similar to the proposed project options, new development under Alternative B would be required to comply with the building code standards to reduce seismic hazards. Therefore, Alternative B would result in similar impacts related to geology and soils as the proposed project options. For similar reasons as discussed in Appendix B, Initial Study, Section E.16, Geology and Soils, p. B-85, project-level and cumulative impacts of Alternative B related to geology and soils would be *less than significant*.

Hydrology and Water Quality

Alternative B would have the same development footprint as the proposed project options; therefore, construction-related impacts on hydrology and water quality would be similar. Wastewater and stormwater infrastructure would be substantially the same under this alternative compared to the proposed project options, and would be appropriately sized for the anticipated discharges from the site. Alternative B would also drain to the combined sewer system like both proposed project options, would control and reduce stormwater runoff in compliance with requirements of the City's Stormwater Management Ordinance. This alternative would have similar operational impacts to those of the proposed project options, and for similar reasons as discussed Appendix B, Initial Study, Section E.17, Hydrology and Water Quality, p. 94, impacts would be *less than significant*.

Hazards and Hazardous Materials

Alternative B would involve the same development footprint as both proposed project options and similar amounts of excavation and ground disturbance compared to the Additional Housing Option. Construction and operation of Alternative B would be subject to the same regulatory requirements associated with the routine handling, transport, and disposal of hazardous materials. Like the proposed project options, Alternative B would be subject to San Francisco Health Code sections 22A and 22B, including requirements to implement a Site Mitigation Plan and Dust Control Plan. Therefore, Alternative B would result in similar *less-than-significant* impacts related to hazards and hazardous materials compared to the proposed project options (see Appendix B, Initial Study, Section E.18, Hazards and Hazardous Materials, p. B-105).

Mineral Resources, Agricultural and Forestry Resources, and Wildfire

As with the proposed project options, Alternative B would have *no impacts* related to mineral resources, agricultural and forestry resources, and wildlife.

Energy

Alternative B would be required to comply with the same green building and energy efficiency standards as would either of the proposed project options and all projects in the cumulative scenario. The reduced building size and lower number of residential units may reduce the amount

of energy used compared to the proposed project options. Therefore, similar to the proposed project options, Alternative B would not result in a wasteful use of energy, a ***less-than-significant*** impact.

Ability of the Reduced Density Alternative to Meet Project Objectives

As shown in Table 6-2, p. 6-11, the Reduced Density Alternative (Alternative B) would meet most of the project objectives, but to a lesser degree than the proposed project options. Alternative B would replace an underused surface parking lot on surplus public land with 800 residential units, implementing the goals of the Public Lands of Housing program, General Plan Housing Element, and the 2009 Balboa Park Station Area Plan. This alternative would construct new housing in proximity to local and regional public transportation and would provide pedestrian and bicycle connections from the project site to adjacent neighborhoods. Alternative B would increase the City's housing supply with 800 units and would contribute to progress towards the City's housing goals, but to a lesser extent than the proposed project options (250 and 900 fewer than the Additional Housing Option and Developer's Proposed Option, respectively). Similar to the proposed project options, Alternative B would replace the reservoir's abandoned infrastructure with new infrastructure improvements including new streets, sidewalks, bicycle and pedestrian amenities, utilities, and community facilities. Alternative B would meet the project objectives, but to a lesser degree than the proposed project options, given that Alternative B would not maximize the number of housing units in the project. The financial feasibility of the Reduced Density Alternative is unknown.

Conclusion

Alternative B would avoid or substantially lessen the severity of the following impacts, reducing them from significant and unavoidable with mitigation to less than significant or no impact:

- Significant and unavoidable substantial temporary or periodic increases in ambient noise levels along the access road to the project site associated with construction truck traffic would be less than the Developer's Proposed Option due to the reduction in construction vehicle trips.

- Significant and unavoidable impacts related to construction-related criteria air pollutant emissions due to construction overlapping with project operations. Construction and operation would not overlap under Alternative B; therefore, no impact would occur.

Significant and unavoidable impacts identified for the project that would be reduced under Alternative B but not to a level of less than significance include the following:

- Significant and unavoidable secondary loading impacts would be slightly less substantial than with the proposed project options due to a reduction in project-generated trips at the Ocean Avenue/Lee Avenue intersection; however, given the uncertainty regarding the ability of the existing loading demand to be accommodated and the presence of active loading dock management by Whole Foods, as with the proposed project options, the impact would remain significant and unavoidable even with mitigation.
- Significant and unavoidable construction-related increases in ambient noise levels to sensitive receptors would be less than those of the proposed project due to the reduction in the duration and magnitude of construction, but noise levels would still be above thresholds and the impact would remain significant and unavoidable even with mitigation.

- Significant and unavoidable cumulative construction-related noise increases would be lessened compared to those with the project due to the reduced contribution to cumulative construction activities, but the impact would still be significant and unavoidable with mitigation.
- Significant and unavoidable impacts related to construction-related criteria air pollutant emissions would be less substantial than with the proposed project options due to the reduced square footage of development, but emission levels would still exceed thresholds, and the impact would remain significant and unavoidable even with mitigation.
- Significant and unavoidable impacts related to construction-generated exposure of sensitive receptors to substantial pollutant concentrations and resulting excess cancer risk would be less substantial than with the proposed project options due to reduced construction activity but would remain significant and unavoidable due to the potential compressed construction schedule, even with mitigation.
- Significant and unavoidable contribution to cumulative regional air quality impacts would be less substantial than with the proposed project options due to the reduced square footage of development, but emission levels would still exceed thresholds, and the impact would remain significant and unavoidable even with mitigation.

Significant impacts that could be mitigated to less than significant that were identified for the proposed project options and would still apply to Alternative B include impacts related to: archeological resources, human remains, tribal cultural resources, operational noise levels of stationary equipment, Clean Air Plan consistency, and paleontological resources.

Alternative C: San Ramon Way Access Alternative

Alternative C is the San Ramon Way Access Alternative, shown in **Figure 6-3, Alternative C: San Ramon Way Access**. The purpose of this alternative is two-fold: (1) to address numerous public comments requesting that access to the project site from San Ramon Way be considered; and (2) lessen potentially hazardous conditions or significant delay due to the project's reconfiguration of Lee Avenue, which would preclude the current (illegal) use of the curbside for truck deliveries.

Description of the San Ramon Way Access Alternative

Alternative C is the San Ramon Way Access Alternative, which would provide access for light vehicles (i.e., passenger cars and vans, but not heavy trucks)[4] to the project site from the west and could be combined with either of the proposed project options. Alternative C would have the same mix of land uses, site plans, building footprints, building heights, square footages, and construction characteristics as the proposed project options. Vehicle, bicycle, and pedestrian circulation to and from the site from the south and east would not change. However, instead of bicycle and pedestrian-only access at San Ramon Way, Alternative C would also include vehicular (non-truck) access, providing access from the west.

[4] The vehicle restrictions would be consistent with those in the Westwood Park neighborhood to the west of the project site, where vehicles over 3 tons are currently prohibited.

San Ramon Way currently terminates just west of the project site; it does not extend all the way to the project site boundary, as the Westwood Park Association (homeowners' association for the Westwood Park neighborhood that is west of the project site) owns a 10-foot-wide parcel between the end of the street and the project site. Therefore, in order for this alternative to be implemented, the city would have to purchase or otherwise secure access through this parcel (e.g., by obtaining an easement).

San Ramon Way is approximately 26 feet wide with a 6-foot-wide sidewalk on the north side and a 7- to 10-foot-wide sidewalk on the south side. Parking is currently allowed on both sides of the street. Under Alternative C, the current dimensions of San Ramon Way would be retained and extended through the project site, ending at West Street. Given the San Francisco Fire Department (SFFD) requirement for a 26-foot-wide clear path of travel, the need to accommodate two-way vehicle traffic and increase in vehicle traffic associated with Alternative C, it is assumed that the on-street parking spaces on the north and south sides of San Ramon Way would be removed under this alternative. San Ramon Way would have a 13-foot-wide single lane of travel in each direction, a 6-foot-wide sidewalk on the north side, and a 7- to 10-foot-wide sidewalk on the south side. San Ramon Way would be a shared roadway that would include class III bicycle facilities (sharrows) within the vehicular lanes.

Figure 6-3 Alternative C: San Ramon Way Access

Alternative C would have the same land uses as the proposed project and could be implemented with either project option. Therefore, this alternative would provide between 1,100 and 1,550 residential units, 7,500 square feet of commercial space, and 10,000 square feet of community space, along with between 650 1,300 off-street parking spaces in buildings up to 78 or 88 feet in height, depending on option.

San Francisco Transportation Code section 501(b) limits the operation of a vehicle with gross weight in excess of 6,000 pounds (3 tons) in the Westwood Park area streets. Therefore, vehicles exceeding the weight limit would be prohibited from traveling on San Ramon Way into or out of the project site, similar to existing truck restrictions in Westwood Park.

Construction

Construction of Alternative C would be similar to the proposed project options, both in magnitude and duration. In general, the same types of construction activities and equipment would be required. Construction trucks and equipment would access the project site from the north access road, similar to the proposed project options. Construction of Alternative C would take about the same amount of time as the proposed project options. It is anticipated that construction would start in 2021 and be completed in 2027, the same 6-year construction duration as the proposed project. Construction would occur in three phases, similar to the proposed project. Like the proposed project, actual construction dates would be subject to changes due to market conditions and other unanticipated factors. Therefore, construction could be complete as early as 2024 or extend beyond 2027. Similar to the proposed project options, if construction occurs over a shorter period than shown in SEIR Chapter 2, Table 2-2, Preliminary Construction Schedule by Phase, p. **Error! Bookmark not defined**. (e.g., Phases 1 and 2 occurring simultaneously following Phase 0), a relatively larger amount of construction would take place during a relatively shorter period of time, thereby increasing the typical daily construction activity.

Impacts of the San Ramon Way Access Alternative

Transportation and Circulation

Travel Demand and Transportation Network Changes

Alternative C would have the same size and mix of land uses as the proposed project options. Therefore, the person-trip and vehicle-trip generation and number of trips people would make to and from the project would be the same as those of the proposed project options (see SEIR **Error! Reference source not found**. to **Error! Reference source not found**., pp. **Error! Bookmark not defined**. to **Error! Bookmark not defined**.). However, because San Ramon Way would be open to non-truck vehicular access under Alternative C, some vehicles would take different paths of travel than would be the case with the proposed project options.

The trip assignment (assumed travel routes for vehicle trips) for Alternative C was developed for weekday a.m. and p.m. peak periods using the following process:

- Identify the origin/destination districts where project-generated vehicles would be most likely to utilize the San Ramon Way access using knowledge of existing travel patterns and route/travel time data from Google Maps.
- Calculate the number of inbound and outbound vehicle trips traveling between the project site and each identified district.
- Reassign these vehicle trips to the surrounding street network and study intersections using knowledge of existing travel patterns and route/travel time data from Google Maps.

Based on review of existing travel patterns and route/travel time data, vehicle trips originating from or destined to the Richmond, Sunset, Outer Mission/Hills, North Bay, and Marina Western districts were reassigned from either the Frida Kahlo Way/North Access or Ocean Avenue/Lee Avenue entrances to the new San Ramon Way entrance.

Developer's Proposed Option

The vehicle trips generated by the Developer's Proposed Option were redistributed to address the addition of vehicular access at San Ramon Way under Alternative C. Under this alternative, approximately 12 percent of project-generated vehicle trips (31 vehicles) would utilize the San Ramon Way access during the weekday a.m. peak hour and 15 percent of project-generated vehicle trips (48 vehicles) would utilize the San Ramon Way access during the weekday p.m. peak hour.

During the weekday a.m. peak hour, 13 vehicles would enter and 18 vehicles would exit the site at that location. During the weekday p.m. peak hour, 34 vehicles would enter and 14 vehicles would exit the site at that location. This increase in vehicle traffic utilizing the San Ramon Way access would correlate to a decrease in vehicles utilizing the Frida Kahlo Way/North Access and Ocean Avenue/Lee Avenue access. Project-generated vehicle trips at the Frida Kahlo Way/North Access intersection would be reduced by three vehicles (3 percent of project-generated vehicle traffic at this intersection) during the weekday a.m. peak hour and nine vehicles (8 percent of project-generated vehicle traffic) during the weekday p.m. peak hour. Project-generated vehicle trips at the Ocean Avenue/Lee Avenue intersection would be reduced by 28 vehicles (19 percent of project-generated vehicle traffic at this intersection) during the weekday a.m. peak hour and 39 vehicles (19 percent of project-generated traffic) during the weekday p.m. peak hour.

Additional Housing Option

The vehicle trips generated by the Additional Housing Option were redistributed to address the addition of vehicular access at San Ramon Way under Alternative C. Under this alternative, approximately 12 percent of project-generated vehicle trips (41 vehicles) would utilize the San Ramon Way access during the weekday a.m. peak hour and 15 percent of project-generated vehicle trips (62 vehicles) would utilize the San Ramon Way access during the weekday p.m. peak hour.

During the weekday a.m. peak hour, 16 vehicles would enter and 25 vehicles would exit the site at that location. During the weekday p.m. peak hour, 45 vehicles would enter and 17 vehicles

would exit the site at that location. This increase in vehicle traffic utilizing the San Ramon Way access would correlate to a decrease in vehicles utilizing the Frida Kahlo Way/North Access and Ocean Avenue/Lee Avenue access. Project-generated vehicle trips at the Frida Kahlo Way/North Access intersection would be reduced by 12 vehicles (9 percent of project-generated vehicle traffic) during the weekday a.m. peak hour and 11 vehicles (7 percent of project-generated vehicle traffic) during the weekday p.m. peak hour. Project-generated vehicle trips at the Ocean Avenue/Lee Avenue intersection would be reduced by 29 vehicles (15 percent of project-generated vehicle traffic) during the weekday a.m. peak hour and 51 vehicles (19 percent of project-generated vehicle traffic) during the weekday p.m. peak hour.

Construction Impacts

As with the proposed project options, Alternative C would be constructed in three phases over a six-year period. Construction truck traffic, truck routing, and construction worker vehicle parking would all occur as under the proposed project options. Given the gross vehicle weight restrictions within Westwood Park[5], construction truck traffic would not utilize San Ramon Way to access the site and would not travel on streets within Westwood Park. Therefore, construction-period transportation effects would be the same under this alternative as with the proposed project options. All requirements applicable to the proposed project options would be applicable to Alternative C. Therefore, as with the proposed project options, Alternative C would also result in a less-than-significant construction-related transportation impact. PEIR Improvement Measure (Construction) is superseded by the requirements of the blue book regulations, which include the development of a construction management plan and review and approval by the SFMTA and public works to address overall coordination of construction activities, transportation-related circulation, access, and staging.

Operational Impacts

Traffic Hazard Impacts

Intersection turning movement counts collected at San Ramon Way/Plymouth Avenue/Southwood Drive on August 28, 2018, show that there are a total of 268 vehicles at the five-legged all-way stop controlled intersection during the weekday a.m. peak hour, including three vehicles (one eastbound/inbound and two westbound/outbound) traveling on San Ramon Way between Plymouth Avenue and the project site. During the weekday p.m. peak hour, there are a total of 226 vehicles at this intersection, including five vehicles (four eastbound/inbound and one westbound/outbound) traveling on San Ramon Way between Plymouth Avenue and the project site. San Ramon Way between Plymouth Avenue and the project site is approximately 26 feet wide with a 6-foot-wide sidewalk on the north side and a 7- to 10-foot-wide sidewalk on the south side. There are currently two active curb cuts serving the adjacent residential buildings and residential permit parking is provided on both sides of the street. Provision of on-street parking narrows the effective roadway width to approximately 10 feet wide in some locations, and two-way vehicle travel is not feasible on this segment. Currently when there is oncoming traffic, one vehicle must find space to pull over and wait for the other vehicle to pass before continuing. These instances are

[5] San Francisco Transportation Code section 501(b) limits the operation of a vehicle with gross weight in excess of 6,000 pounds (3 tons) in the Westwood Park area streets

rare and this is not an issue under existing conditions due to the low traffic volumes on the segment.

As discussed above, under Alternative C with the Developer's Proposed Option a total of 31 vehicles (13 inbound, 18 outbound) would utilize the San Ramon Way entrance during the weekday a.m. peak hour and 48 vehicles (34 inbound, 14 outbound) would utilize the San Ramon Way entrance during the p.m. peak hour. Under Alternative C with the Additional Housing Option a total of 41 vehicles (16 inbound, 25 outbound) would utilize the San Ramon Way entrance during the weekday a.m. peak hour and 62 vehicles (45 inbound, 17 outbound) would utilize the San Ramon Way entrance during the p.m. peak hour.

The Developer's Proposed Option would increase vehicle traffic at the San Ramon Way/Plymouth Avenue/Southwood Drive intersection by about 12 percent during the weekday a.m. peak hour and by about 21 percent during the weekday p.m. peak hour. The Additional Housing Option would increase vehicle traffic at the San Ramon Way/Plymouth Avenue/Southwood Drive intersection by about 15 percent during the weekday a.m. peak hour and by about 27 percent during the weekday p.m. peak hour. Beyond this intersection, the majority of project-generated vehicles would travel along Plymouth Avenue to and from the project site.

Assuming removal of parking on both sides of San Ramon Way between Plymouth Avenue and the project site and striping two 12- to 13-foot wide travel lanes and class III bicycle facilities (sharrows), this level of vehicle traffic could be accommodated on San Ramon Way. Given the width of the travel lanes and the relatively low level of vehicle traffic volumes on this segment under existing plus project conditions (a maximum of 67 vehicles [49 inbound/westbound, 18 outbound/eastbound] during the weekday p.m. peak hour with the Additional Housing Option) the proposed project is not expected to result in significant queues or increases in vehicle delay at the San Ramon Way/Plymouth Avenue/Southwood Drive intersection, nor would it pose unusual safety hazards due to the relatively low traffic volumes.

The primary access points for people walking to the project site would be from the northern extension of Lee Avenue, through Unity Plaza, the pedestrian paseos connecting to Brighton Avenue and San Ramon Way, and the shared use path connecting to Plymouth Avenue. The addition of project-generated vehicle traffic to San Ramon Way under Alternative C would increase the potential for conflicts between project-generated vehicles and people walking to the site. However, drivers would generally be traveling at speeds less than 25 miles per hour and would have unobstructed sightlines and/or substantial sight distance to see people walking on the sidewalk and bicycling along the shared roadway. Therefore, Alternative C would not create hazards for people walking or bicycling.

The addition of project-generated vehicle traffic to the surrounding streets, including Plymouth Avenue, Southwood Drive, and San Ramon Way west of Plymouth Avenue, would result in slower vehicle speeds on these streets. Given the narrow width of these streets, 25 to 26 feet with on-street parking on both sides, the addition of vehicle traffic generated by the project would increase instances of oncoming traffic and where there is not sufficient space for vehicles to pass

side-by-side, one driver would need to pull over and yield to allow the other driver to pass. When opposing traffic volume increases, particularly on narrow streets where drivers must either pull over and stop to let other vehicles pass or where the perception of street width is too narrow to judge accurately, there is a strong correlation with reduced average travel speed.[6] On-street parking density plays an important role in defining the effective width of the street. On narrow streets such as these, with a relatively high density of parking, the effective width can be as narrow as a single travel lane forcing a driver to pull over and stop when an opposing vehicle is encountered. While the increase in traffic volumes and related reduction in travel speed may increase the potential for sideswipe collisions, because it would reduce travel speeds, it would likely create a more comfortable environment for people walking and bicycling, and overall, Alternative C would not create hazards for people driving.

Alternative C would reduce the project-generated traffic volumes at the Ocean Avenue/Lee Avenue intersection under both proposed project options and compared to the Developer's Proposed Option and Additional Housing Option would result in less frequent and shorter duration of vehicles blocking the City College Terminal and would not create hazardous conditions for public transit operations.

As discussed above, because the project would not generate activities that would create hazardous conditions for people walking, bicycling, driving or public transit operations, impacts of Alternative C would be ***less than significant***.

Accessibility and Emergency Access Impacts

Alternative C does not involve any changes to the roadway network or include any design features that would interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access.

With the assumed modifications to San Ramon Way, specifically removal of parking on both sides of the street east of Plymouth Street, the street would provide sufficient clear width (approximately 26 feet) for emergency vehicle access and to meet fire department requirements.[7] San Ramon Way would provide one additional emergency access point to the project site and nearby hospitals as compared to existing conditions and conditions with the proposed project options.

Alternative C would reduce the project-generated traffic volumes at the Ocean Avenue/Lee Avenue intersection under both proposed project options and, compared to the Developer's Proposed Option and Additional Housing Option, would result in less frequent and shorter duration of vehicles blocking the SFFD Station 15 entrance and would not result in inadequate emergency access.

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6 Daisa, James M. and Peers, John B. ITE Journal. Narrow Residential Streets: Do They Really Slow Down Speeds? *https://nacto.org/docs/usdg/narrow_residential_streets_daisa.pdf*, accessed April 24, 2019.

7 San Francisco Fire Code section 503.2.1, *http://sf-fire.org/501-street-widths-emergency-access*, accessed May 25, 2018.

Alternative C would increase traffic volumes along Plymouth Avenue by approximately 40 vehicles during the a.m. and p.m. peak hours and would cause a slight increase in vehicle traffic on other streets within the Westwood Park neighborhood. The addition of project-generated vehicle traffic to the surrounding streets, including Plymouth Avenue, Southwood Drive, and San Ramon Way west of Plymouth Avenue, would result in slower vehicle speeds within Westwood Park. Given the narrow width of these streets, 25- to 26-feet with on-street parking on both sides, the addition of vehicle traffic generated by the project would increase instances of oncoming traffic and where there is not sufficient space for vehicles to pass side-by-side, one driver would need to pull over and yield to allow the other driver to pass. The project-related increase in vehicle traffic may affect emergency response times and emergency vehicle access to buildings within this neighborhood. **[Note to Reviewer: the project-generated vehicle traffic would slow vehicle traffic and increase emergency response times and access to buildings within Westwood Park. Given the parking density along Plymouth Avenue, the ability for drivers to pull out of the way of emergency vehicles is limited. This note has been added as a placeholder based on Kittelson's discussion with EP. Impact conclusion to be discussed.]**

Transit Impacts

As with the proposed project options, Alternative C would not result in the relocation or removal of any existing transit stops or other changes that would alter transit service. Alternative C would generate the same number of transit trips distributed to the same transit lines and would therefore result in the same amount of passenger boarding delay as the proposed project options. The project-generated vehicle trips would be redistributed under Alternative C such that there would be fewer vehicle trips traveling along Ocean Avenue and Frida Kahlo Way. Therefore, compared to the proposed project options, Alternative C would result in less traffic congestion and transit delay. Additionally, Alternative C would reduce the project-generated traffic volumes at the Ocean Avenue/Lee Avenue intersection under both proposed project options and compared to the Developer's Proposed Option and Additional Housing Option would result in less frequent and shorter duration of vehicles blocking the City College Terminal.

Given the considerations described above, Alternative C would have a *less-than-significant* impact on transit delay.

VMT Impacts

The vehicle miles traveled for Alternative C is the same as under the proposed project options. The existing average daily VMT per capita for residential, retail, and office uses are more than 15 percent below the existing and future regional averages. Therefore, as with the proposed project options, Alternative C would have a *less-than-significant* impact related to VMT.

Loading Impacts

The on-site and off-site loading conditions for Alternative C would be the same as under the proposed project options. The proposed supply of on-site freight and passenger loading spaces would meet estimated project-generated demand for freight and passenger loading.

As with the proposed project, Alternative C would extend Lee Avenue into the project site, altering Lee Avenue's current status as a dead-end street and de facto, if illegal, freight loading

area, as well as its use for passenger loading. This reconfiguration of Lee Avenue would effectively reduce the supply of on-street loading available to Whole Foods and nearby land uses, notwithstanding the fact that the current loading activity is neither legal nor in compliance with the conditions of approval for the 1150 Ocean Avenue project. Like the proposed project options, Alternative C would also convert five metered parking spaces (105 linear feet) to commercial loading along Ocean Avenue between Lee Avenue and Brighton Avenue. The addition of vehicular access at San Ramon Way would alter travel patterns to and from the project site. As described above, Alternative C would reduce project-generated traffic volumes at the Ocean Avenue/Lee Avenue intersection by 28 vehicles during the weekday a.m. peak hour and 39 vehicles during the weekday p.m. peak hour for the Developer's Proposed Option, and by 29 vehicles during the weekday a.m. peak hour and 51 vehicles during the weekday p.m. peak hour for the Additional Housing Option. Project-generated traffic volumes would be reduced by 19 percent at the Ocean Avenue/Lee Avenue intersection under Alternative C, which would meaningfully reduce the effect on off-street freight loading, compared to that of the project options Nevertheless.as with the proposed project option, Alternative C operations could adversely freight loading/unloading and passenger pickup and drop-off may create hazardous conditions for people walking or bicycling, and could result in increased queues that delay transit and other vehicles. Therefore, as such, as with the proposed project options, Alternative C would result in a significant secondary effects with respect to loading. Mitigation Measure M-TR-6, p. **Error! Bookmark not defined.**, would be applicable to Alternative C. However, Moreover, as discussed under Impact TR-4, p. **Error! Bookmark not defined.**, given the uncertainty regarding the ability of the existing loading demand to be accommodated and the presence of active loading dock management by Whole Foods, as with the proposed project options, Alternative C would result in a ***significant and unavoidable with mitigation*** impact with respect to loading.

Cumulative Impacts

Alternative C would not contribute to any cumulative impacts on vehicle miles traveled, traffic hazards, pedestrian or bicycle travel, transit, loading, emergency vehicle access, or project-specific construction as none were identified.

Noise

Compared to the proposed project options, under Alternative C there would be the same amount of demolition and construction activity. There would be a negligible amount of additional construction for the San Ramon Way access point.

Construction Noise

The construction program for Alternative C would be the same as with the proposed project options. The type of construction equipment and use characteristics would not change because demolition, excavation, and construction activities would still occur. Thus, the potential to generate substantial temporary noise increases of at least 10 dBA over ambient levels at off-site locations along Ocean Avenue, Plymouth Avenue, and at Riordan High School would remain (see Impact NO-1, p. **Error! Bookmark not defined.**, and the noise impacts from these activities under Alternative C would also be significant and unavoidable with mitigation. Two discrete construction phases would continue to result in the occupancy of a new building from Phase 1 by

future residents during later construction phases. For these reasons, implementation of Mitigation Measure M-NO-1, p. **Error! Bookmark not defined.**,would be required.

The construction noise reduction strategies identified under Mitigation Measure M-NO-1, p. **Error! Bookmark not defined.**, would reduce the construction noise impact at off-site and on-site sensitive receptor but, as with the proposed project and project variants, would remain significant and unavoidable with mitigation.

The excavation assumed for the below-grade public parking garage for the Developer's Proposed Option would also occur under Alternative C. Therefore, Alternative C would have the same number of construction-related truck trips and their associated roadside noise level increases compared to the Developer's Proposed Option and roadside traffic noise levels at the nearby sensitive receptors would exceed 5 dBA over existing levels along the North Access Road. Therefore, Mitigation Measure M-NO-3, p. **Error! Bookmark not defined.**, would also apply to Alternative C. However, given that the relocation of this road would be subject to City College approval, the implementation of this measure cannot be assured. Similar to the Developer's Proposed Option, impacts would be ***significant and unavoidable with mitigation.***

Construction Vibration

Under Alternative C as with the proposed project options, construction activities that generate groundborne vibration would occur, e.g., the use of excavators and vibratory rollers, but existing distances of construction areas from buildings would be sufficient to attenuate vibrations to ***less-than-significant*** levels.

Operational Noise

Stationary Equipment

Under Alternative C, emergency diesel generators that would be required for building height in excess of 75 feet under the proposed project options would also be required for Alternative C because several building heights would be above this level. HVAC equipment would still likely be located on the rooftops. As with the proposed project options variants, Mitigation Measure M-NO-3, p. **Error! Bookmark not defined.**, would still be required under Alternative C for rooftop equipment to ensure that proper enclosures or other sound muffling measures would be implemented to meet regulatory requirements established in the Noise Ordinance. Therefore, like the proposed project options, this impact would be ***less than significant with mitigation.***

Operational Traffic

The mix of uses in Alternative C would be the same as the mix in the proposed project and project variants. However, trip distribution would change with the added ingress and egress point of San Ramon Way. Specifically, the San Ramon way access point would result in 29 additional vehicles on Plymouth Avenue between San Ramon Way and Monterey Boulevard during the a.m. peak traffic hour and 45 additional vehicles during the p.m. peak traffic hour in the Developers Project Option and 59 additional vehicles during the p.m. peak traffic hour in the Additional Housing Option. Using available data for the segment of Plymouth Avenue between Ocean Avenue and Southwood Drive, roadside noise levels under this alternative for the

Developer's Proposed Option and Additional Housing Option would increase by 1.0 and 1.3 dBA, respectively. These increases would be imperceptible to most observers and would be well below the applicable threshold of 5 dBA, resulting in a less-than-significant impact with respect to roadside traffic noise. Therefore, the traffic noise increase would be *less than significant* for Alternative C.

Land Use Compatibility

Like the proposed project options, Alternative C would result in the introduction of new residential land uses within the same footprint of the site as the proposed project options. Alternative C would have less-than significant noise compatibility impacts related to future noise levels similar to those identified for the proposed project options (see Impact NO-5, p. **Error! Bookmark not defined**.).

Cumulative Impacts

Construction-related cumulative noise and vibration impacts under Alternative C would be similar to those of the proposed project options in combination with noise from construction of other nearby projects of City College during the buildout period for the alternative, and would continue to be less than significant with mitigation (see Impact C-NO-1, p. **Error! Bookmark not defined**.). Under 2040 cumulative conditions with the proposed project options, a traffic noise increase of 3.3 dBA or less was identified resulting in a less-than-significant cumulative noise impact (see Impact C-NO-2, p. **Error! Bookmark not defined**.). Alternative C would result in the same or smaller contributions due to the availability of the San Ramon access point on all roadways except San Ramon Way and Plymouth Avenue. Cumulative conditions would add another 39 vehicles to Plymouth Way but this cumulative contribution would not be enough to result in a significant roadside noise increase of 5 dBA. Neither the Developers Proposed Option or the Additional Housing Option, in combination with forecast cumulative traffic growth in 2040 would result in an ambient noise increase of over 5 dBA or more. Therefore, cumulative noise impacts with operation of Alternative C would continue to be less than significant.

Air Quality

Air quality impacts of the proposed project are described in SEIR Section 3.D, Air Quality, and as described below, air quality impacts of the alternatives would be similar.

Construction Impacts: Fugitive Dust Emissions

As with the proposed project, construction activities under Alternative C would be required to comply with the Construction Dust Control Ordinance, and to implement specified dust control measures. Compliance with the regulations and procedures set forth by the Construction Dust Control Ordinance would ensure that like the proposed project, potential dust related air quality impacts for Alternative C would be *less than significant*.

Construction and Overlapping Operational Impacts: Criteria Air Pollutant Emissions

As discussed under Impact AQ-2a and Impact AQ-2b, pp. **Error! Bookmark not defined**. and **Error! Bookmark not defined**., respectively, construction-related emissions of NOx for the Developer's Proposed Option would exceed significance thresholds in 2022 and 2024. Therefore,

this would be a significant impact. Alternative C would require the same construction activity as the proposed project given that Alternative C would have the same mix of land uses, site plans, building footprints, building heights, square footages, and construction characteristics as the proposed project options. In addition, because the construction schedule for the proposed project options could be compressed into as little as three years, average daily combined construction and operational emissions could increase substantially, increasing the ROG and NOx exceedances. Thus, all construction-related and operational-related mitigation measures identified for the Developer's Proposed Option would be applicable to Alternative C (i.e., Mitigation Measures M-AQ-2a, Construction Emissions Minimization, p. **Error! Bookmark not defined.**; M-AQ-2b, Low-VOC Architectural Coatings, p. **Error! Bookmark not defined.**; M-AQ-2c, Offset Construction and Operational Emissions, p. **Error! Bookmark not defined.**; M-AQ-2d, Diesel Backup Generator Specifications, p. **Error! Bookmark not defined.**; M-AQ-2e, Promote Use of Green Consumer Products, p. **Error! Bookmark not defined.**; and M-AQ-2f, Additional Mobile Source Control Measures, p. **Error! Bookmark not defined.**). Similar to the proposed project, this impact would be ***significant and unavoidable with mitigation.***

Operational Impacts: Criteria Air Pollutant Emissions

For the proposed project, operational emissions would be below thresholds of significance for all criteria pollutants for both Phase 1 operation in 2024 and full buildout operation in 2027. This is a less-than-significant impact and no mitigation measures are required. Alternative C would have the same land use and person trip rates as the proposed project options. Therefore, Alternative C is anticipated to the same operational emissions as the proposed project. However, mitigation measures have been identified to reduce combined construction and operational emissions as discussed under Impact AQ-2b, p. **Error! Bookmark not defined.**. Thus, all operational-related mitigation measures identified for the proposed project would be applicable to Alternative C (i.e., Mitigation Measures M-AQ-2c, Offset Construction and Operational Emissions, p. **Error! Bookmark not defined.**; M-AQ-2d, Diesel Backup Generator Specifications, p. **Error! Bookmark not defined.**; M-AQ-2e, Promote Use of Green Consumer Products; p. **Error! Bookmark not defined.**; and M-AQ-2f, Additional Mobile Source Control Measures, p. **Error! Bookmark not defined.**). With incorporation of these mitigation measures, operational ROG and NOx emissions would be reduced further below the significance thresholds, and this impact would remain at ***less-than-significant*** levels.

Concerning localized effects of traffic redistribution under Alternative C, as explained in Section 3.D, Air Quality, criteria air pollutants are generally analyzed on a regional basis. Reactive organic gases (ROG) and nitrogen oxides (NOx), for example, are emitted from combustion (including by motor vehicle engines), but they are transformed into the pollutant ozone only through a regional process of wind-driven transportation and diffusion concurrent with a photochemical reaction under exposure to sunlight. For this reason, while ozone is a respiratory irritant, it is typically not created at the same location and to the same degree at which ROG and NOx are generated. Carbon monoxide, on the other hand, is evaluated locally, and areas where ambient concentrations exceed state and/or federal standards are termed hotspots. However, as explained in Section 3.D, carbon monoxide levels in San Francisco are far below the applicable standards, and it would take a minimum of 24,000 vehicles per hour to generate sufficient carbon monoxide to exceed the state standard. Therefore, the addition of up to

62 vehicles per hour (under Alternative C with the Additional Housing Option) would not result in a perceptible change in carbon monoxide concentration at locations on or near San Ramon Way, and this impact would be ***less than significant***. See below for a discussion of other local air quality impacts related to cancer risk and concentration of fine particulates.

Toxic Air Contaminants, Construction and Operation

Construction and operation of the proposed project would generate toxic air contaminants, including diesel particulate matter, which could expose both offsite and onsite sensitive receptors to a localized health risk. Similar to the proposed project, construction and operation of Alternative C would generate toxic air contaminants, including diesel particulate matter. Given that Alternative C would have the same construction and operational activity as the proposed project, it is anticipated that the Alternative C would result in similar construction and operational emissions of diesel particulate matter and $PM_{2.5}$.

Under Alternative C, because San Ramon Way would be open to vehicular access, the location or assignment of vehicle trips would be different compared to the proposed project options. Some vehicle traffic would use San Ramon Way to access the site, potentially increasing the exposure of both offsite residential receptors along San Ramon Way as well as onsite residential sensitive receptors close to the San Ramon Way ingress / egress point (such as the townhomes) to DPM and TACs contained in total organic compounds (TOG) from gasoline vehicle exhaust associated with this traffic. However, as discussed above, trucks would be prohibited from traveling on San Ramon Way into or out of the project site, so DPM emissions and exposure of these offsite and onsite residential sensitive receptors to DPM would be minimal. The cancer risk associated with TOG emissions from gasoline vehicle exhaust is extremely small compared with cancer risk associated with DPM from construction activity (0.1 to 0.2 percent of the total construction plus operations risk at any of the maximally exposed receptors), so it is not anticipated that the new TAC/TOG exposure associated with Alternative C would increase cancer risks at any offsite residential sensitive receptor near San Ramon Way. For operational risk only, the lifetime excess cancer risk due to operational vehicle TOG exposure at offsite sensitive receptor locations along the roadways where vehicles will travel for the proposed project, such as near Lee Avenue, ranges from 0.2 to 0.4; it is expected that the increased cancer risk from Alternative C along San Ramon Way would be of similar magnitude. Therefore, the new exposure associated with TAC emissions from vehicles traveling along San Ramon Way for Alternative C would be less than significant.

Given that Alternative C would develop the same land uses as the proposed project options, increased cancer risk under Alternative C would be significant in the absence of mitigation, as with the project options. However, with implementation of Mitigation Measures M-AQ-2a, Construction Emissions Minimization, p. **Error! Bookmark not defined.**; M-AQ-2b, Diesel Backup Generator Specifications, p. **Error! Bookmark not defined.**; and M-AQ-4, Install MERV 13 Filters at the Daycare Facility, p. **Error! Bookmark not defined.**, lifetime cancer risk to offsite and onsite receptors under Alternative C is anticipated to be similar to that of the proposed project due to a similar amount of construction activity. Therefore, with mitigation, Alternative C would not result in offsite sensitive receptor locations meeting the APEZ criterion for cancer risk, and impacts related to construction and operational exposure to toxic air

contaminants for receptors not in the APEZ would be ***less than significant with mitigation***. With respect to offsite receptors already in the APEZ, vehicles traveling on San Ramon Way would not increase exposure to sensitive receptors located in the APEZ. The closest APEZ receptors to the project site are located near I-280, far from San Ramon Way. Therefore, Alternative C is not expected to result in any new impacts for receptors in the APEZ. However, similar to the proposed project options, because the construction schedule is subject to change, potentially increasing the exposure of offsite receptors, impacts related to construction and operational exposure to toxic air contaminants for receptors in the APEZ would be ***significant and unavoidable with mitigation***.

Similar to the analysis above for cancer risk for receptors not in the APEZ, annual average $PM_{2.5}$ concentrations for Alternative C are expected to be similar to the proposed project, and the new vehicle travel along San Ramon Way is not anticipated to increase annual average $PM_{2.5}$ concentrations by any significant margin. As with the proposed project options, annual average $PM_{2.5}$ concentrations for Alternative C would be ***less than significant with mitigation*** (Mitigation Measures M-AQ-2a, Construction Emissions Minimization; M-AQ-2b, Diesel Backup Generator Specifications; and M-AQ-4, Install MERV 13 Filters at the Daycare Facility) for receptors not in the APEZ) and ***less than significant*** (for receptors in the APEZ) for Alternative B, similar to conditions with the project options. Annual average $PM_{2.5}$ concentrations associated with light-duty vehicles traveling near the project site represents a small percentage of total annual average $PM_{2.5}$ concentrations for all sources associated with the proposed project, and the relatively low project traffic volumes that would use the San Ramon Way access under this alternative would not substantially affect $PM_{2.5}$ concentrations on or near San Ramon Way or alter the above conclusions.

Consistency with Clean Air Plan

Alternative C would be required to comply with the City's Transportation Demand Management (TDM) ordinance, which would require preparation and implementation of a TDM plan. Similar to the proposed project, Alternative C would require additional mitigation measures to ensure consistency with the Clean Air Plan, and with inclusion of such mitigation measures, this impact would be ***less than significant with mitigation***. In addition to any TDM-related measures, it would be expected that Mitigation Measures M-AQ-2a (Construction Emissions Minimization), M-AQ-2b (Low-VOC Architectural Coatings), M-AQ-2e (Promote Use of Green Consumer Products), M-AQ-2f (Additional Mobile Source Control Measures), and M-AQ-4 (Install MERV 13 Filters at the Daycare Facility), would apply to Alternative C.

Odors

Like the proposed project, Alternative C would not create objectionable odors that would affect a substantial number of people. As described for the project, for Alternative C, construction odors associated with diesel-powered vehicles and equipment would be temporary and not likely to extend beyond the project site. During operations, small-scale localized odor issues could occur (e.g., near sources such as solid waste collection, food preparation, etc.), but Alternative C would be required to implement odor controls as required by applicable Bay Area Air Quality Management District regulations that place limitations on odorous substances. Therefore, for Alternative C, odor impacts would be ***less than significant***.

Cumulative Impacts: Regional Air Quality

As discussed above, although no single project by itself would be sufficient in size to result in non-attainment of ambient air quality standards, the project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, because emissions from Alternative C are anticipated to exceed the project-level thresholds as explained above, Alternative C would result in a considerable contribution to cumulative regional air quality impacts, a significant impact. Implementation of Mitigation Measures M-AQ-2a through M-AQ-2f, would reduce the severity of this impact; however, because of uncertainties in the implementation of these measures (particularly Mitigation Measure M-AQ-2c), these measures would not reduce the project's contribution to the cumulative impact to a less-than-significant level. Therefore, emissions of criteria air pollutants associated with Alternative C would be cumulatively considerable, and this cumulative impact would be ***significant and unavoidable with mitigation.***

Cumulative Impacts: Health Risk

Alternative C would result in the same construction activity and operational activity, including vehicle trips and backup diesel generators, and would therefore, result in the same cumulative impact determination for $PM_{2.5}$ impact as the proposed project: less than significant with mitigation for all receptors. Additionally, Alternative C would also contribute to a cumulative health risk impact for lifetime cancer risk for offsite and onsite receptors not in the APEZ, but the contribution would be less than significant with implementation of Mitigation Measure M-AQ-2a, Construction Emissions Minimization. However, Alternative C would also contribute to a cumulative health risk impact for lifetime cancer risk for offsite receptors in the APEZ, and the contribution is conservatively considered significant and unavoidable, despite implementation of Mitigation Measure M-AQ-2a. Thus, overall, contribution of Alternative C to the cumulative health risk impact would be ***significant and unavoidable with mitigation.***

Initial Study Topics

Alternative C would be the same as the proposed project options, including the same residential units and same area of ground disturbance, but would include vehicular access to the site via San Ramon Way. As a result, the number of onsite residents, employees, and construction-related employees would be the same as the proposed project options. Impacts of Alternative C would be the same as those of the proposed project options, described in Appendix B, Initial Study, for the following topics: aesthetics, population and housing, cultural resources, tribal cultural resources, greenhouse gas emissions, wind, shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, energy, agriculture and forest resources, and wildfire.

Land Use and Land Use Planning

Alternative C would be the same as the proposed project options but would provide more integration with the surrounding neighborhood than the proposed project options because San Ramon Way would provide pedestrian, bicycle, and vehicle access. Alternative C would have the same ***less-than-significant*** project-level land use impacts as the proposed project options (see

Appendix B, Initial Study, Section E.1, Land Use and Planning, p. 12), and would not combine with other cumulative land uses changes to generate a significant cumulative land use and land use planning impact.

Ability of the San Ramon Way Access Alternative to Meet Project Objectives

The San Ramon Way Access alternative would fully meet all project objectives, as detailed in Table 6-2, p. 6-11. Additional vehicle access from San Ramon Way would not reduce this alternative's ability to meet project objectives compared to the proposed project options. The San Ramon Way Access Alternative would build the same number and mix of housing units as the proposed project options, and the same infrastructure, open space, and streetscape improvements would be constructed.

Conclusion

Significant and unavoidable impacts identified for the project that would not be substantially reduced under Alternative C and would still occur include the following:

- Significant and unavoidable secondary loading impacts would be slightly less substantial than with the proposed project options due to a reduction in project-generated trips at the Ocean Avenue/Lee Avenue intersection; however, given the uncertainty regarding the ability of the existing loading demand to be accommodated and the presence of active loading dock management by Whole Foods, as with the proposed project options, the impact would remain significant and unavoidable even with mitigation.
- Significant and unavoidable construction-related increases in ambient noise levels to sensitive receptors would be less than those of the proposed project due to the reduction in the duration and magnitude of construction, but noise levels would still be above thresholds and the impact would remain significant and unavoidable even with mitigation.
- Significant and unavoidable substantial temporary or periodic increases in ambient noise levels along the access road to the project site associated with construction truck traffic.
- Significant and unavoidable cumulative construction-related noise increases would be lessened compared to those with the project due to the reduced contribution to cumulative construction activities, but the impact would still be significant and unavoidable with mitigation.
- Significant and unavoidable impacts related to construction-related criteria air pollutant emissions would be less substantial than with the proposed project options due to the reduced square footage of development, but emission levels would still exceed thresholds, and the impact would remain significant and unavoidable even with mitigation.
- Significant and unavoidable impacts related to construction-generated exposure of sensitive receptors to substantial pollutant concentrations and resulting excess cancer risk would be less substantial than with the proposed project options due to reduced construction activity but would remain significant and unavoidable due to the potential compressed construction schedule, even with mitigation.
- Significant and unavoidable contribution to cumulative regional air quality impacts would be less substantial than with the proposed project options due to the reduced square footage of development, but emission levels would still exceed thresholds, and the impact would remain significant and unavoidable even with mitigation.

In addition, there is the potential for Alternative C to have an additional significant and unavoidable impact associated with emergency vehicle access and response times.

Significant impacts that could be mitigated to less than significant that were identified for the proposed project options and would still apply to Alternative C include impacts related to: archeological resources, human remains, tribal cultural resources, operational noise levels of stationary equipment, Clean Air Plan consistency, and paleontological resources.

6.D Environmentally Superior Alternative

The CEQA Guidelines section 15126.6(e) requires the identification of an environmentally superior alternative to the proposed project. Based on the analysis and comparison of the impacts of the alternatives presented above, the No Project Alternative would be the environmentally superior alternative because it would result in no impacts to all resources. However, the No Project Alternative would not meet any of the project objectives. While Alternative A would offer environmental advantage over the proposed project, CEQA Guidelines section 15126.6(e)(2) provides that if the "no project" alternative is the environmentally superior alternative, the EIR should also identify an environmentally superior alternative among the other alternatives.

Table 6-4, Error! Reference source not found., identifies the level of impact for the proposed project options and each alternative (e.g., no impact, less-than-significant impact, less-than-significant impact with mitigation, significant and unavoidable impact, or significant and unavoidable impact with mitigation) and whether the impact of the alternative would be the same as, less than, or greater than the proposed project options impacts. In some cases, the proposed project options and alternative would result in the same significance determination, but the degree of that impact with the alternative might be less than or greater than the proposed project options.

If the No Project Alternative is environmentally superior, then an EIR must is required to identify another environmentally superior alternative from among the alternatives evaluated if the proposed project options have significant impacts that cannot be mitigated to a less-than-significant level. The environmentally superior alternative is the alternative that best avoids or lessens any significant effects of the proposed project, even if the alternative would impede to some degree the attainment of the project objectives.

Therefore, among all of the alternatives including the "no project" alternative, Alternative B, Reduced Density Alternative, is considered the environmentally superior alternative. Alternative B would eliminate the substantial temporary or periodic increases in ambient noise levels along the access road to the project site associated with construction truck traffic that would occur under the Developer's Proposed Option. However, this noise impact would be the same as the Additional Housing Option, which would not have a significant impact associated with construction truck traffic along the access road. Alternative B would also eliminate the significant and unavoidable criteria air pollutant emissions due to construction overlapping with project operation. The remaining significant and unavoidable impacts identified for the proposed project options would still occur under Alternative B; however, this alternative would lessen the

severity of the significant adverse impacts related to project-level and cumulative construction-related air quality and health risks compared to the impacts of the proposed project options. Alternative B would meet most of the basic project objectives, but to a lesser extent than the proposed project options due to the reduced number of housing units. This alternative would result in less severe environmental impacts than the proposed project options.

While Alternative B, Reduced Density Alternative, would reduce the severity of a number of impacts identified herein, it must be noted that, to the extent that the demand for additional housing would be met at another location in the Bay Area that is not proximate to BART and other transit service, residents of such development could potentially generate greater impacts on transportation systems (including vehicle miles traveled), air quality, and greenhouse gases than would be the case for the proposed project options. This would be particularly likely for development in more outlying parts of the region where fewer services and less transit access is provided. While it would be speculative to attempt to quantify or specify the location where such development would occur and the subsequent impacts thereof should the Reduced Density Alternative be approved, it is acknowledged that Alternative B would reduce local impacts in the project vicinity, while potentially increasing regional emissions of criteria air pollutants and greenhouse gases, as well as regional traffic congestion. Alternative B might also incrementally increase impacts related to "greenfield" development on previously undeveloped locations in the Bay Area and, possibly, beyond.

TABLE 6-4
COMPARISON OF ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT OPTIONS TO IMPACTS OF THE ALTERNATIVES

Impact of Proposed Project Options[a]	Alternative A: No Project	Alternative B: Reduced Density	Alternative C: San Ramon Way Access
Summary of Impacts for Topics in this SEIR			
SEIR Section 3.B, Transportation and Circulation			
Impact TR-6: Operation of the proposed project, including proposed street network changes, would result in a reduction in on-street loading supply such that the loading demand during the peak hour of loading activities would not be accommodated within the on-street loading supply, would impact existing passenger and freight loading/unloading zones, and may create hazardous conditions or significant delay that may affect transit, other vehicles, bicycles, or people walking. (SUM)	NI <	**SUM** <	**SUM** <
All other transportation impacts LTS	NI <	LTS ≤	LTS ≤
SEIR Section 3.C, Noise			
Impact NO-1: Project construction would cause a substantial temporary or periodic increase in ambient noise levels at noise-sensitive receptors above levels existing without the project. (SUM)	NI <	**SUM** <	**SUM** =
Impact NO-2: Construction truck traffic would cause a substantial temporary or periodic increase in ambient noise levels along access streets in the project vicinity. (SUM)	NI <	LTS <	**SUM** =
Impact NO-4: Operation of the stationary equipment on the project site could result in a substantial permanent increase in ambient noise levels in the immediate project vicinity, and permanently expose noise-sensitive receptors to noise levels in excess of standards in the San Francisco Noise Ordinance. (LSM)	NI <	LSM <	LSM =
Impact C-NO-1: Cumulative construction of the proposed project combined with construction of other cumulative projects could cause a substantial temporary or periodic increase in ambient noise levels.	NI <	**SUM** <	**SUM** =
All other noise impacts LTS	NI <	LTS <	LTS =
SEIR Section 3.D, Air Quality			
Impact AQ-1: During construction, the proposed project would not generate fugitive dust that could violate an air quality particulate standard, contribute substantially to an existing or projected particulate violation, or result in a cumulatively considerable net increase in particulate concentrations. (LTS)	NI <	**SUM** <	**SUM** =
Impact AQ-2a: During construction, the proposed project would generate criteria air pollutants which would violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (SUM)	NI <	**SUM** =	**SUM** =
Impact AQ-2b: During construction phases that overlap with project operations, the proposed project would generate criteria air pollutants which would violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (SUM)	NI <	NI <	**SUM** =

Impact of Proposed Project Options[a]	Alternative A: No Project	Alternative B: Reduced Density	Alternative C: San Ramon Way Access
Impact AQ-3: During project operations, the proposed project would result in emissions of criteria air pollutants at levels that would violate an air quality standard, contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants.(LSM)	NI <	LSM <	LSM =
Impact AQ-4: Construction and operation of the proposed project would generate toxic air contaminants, including DPM, which could expose sensitive receptors to substantial pollutant concentrations. (SUM)	NI <	**SUM** **<**	**SUM** **=**
Impact AQ-5: The proposed project could conflict with implementation of the Bay Area 2017 Clean Air Plan. (LSM)	NI <	LSM =	LSM =
Impact AQ-6: The proposed project would not create objectionable odors that would affect a substantial number of people.(LTS)	NI <	LTS =	LTS =
Impact C-AQ-1: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area, would contribute to cumulative regional air quality impacts. (SUM)	NI	**SUM** **<**	**SUM** **=**
Impact C-AQ-2: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area, could contribute to cumulative health risk impacts on sensitive receptors.(SUM)	NI	**SUM** **=**	**SUM** **=**
Summary of Impacts for Topics in the Initial Study			
Initial Study Section E.1, Land Use and Land Use Planning			
All impacts LTS	NI <	LTS =	LTS =
E.2, Aesthetics			
N/A	N/A	N/A	N/A
E.3, Population and Housing			
All impacts LTS	NI <	LTS <	LTS =
E.4, Cultural Resources			
Impact CR-2: The proposed project could cause a substantial adverse change in the significance of an archeological resource pursuant to section 15064.5. (LSM)	NI <	LSM =	LSM =
Impact CR-3: The proposed project may disturb human remains, including those interred outside of formal cemeteries. (LSM)	NI <	LSM =	LSM =
All other cultural resources impacts LTS	NI <	LTS =	LTS =

Impact of Proposed Project Options[a]	Alternative A: No Project	Alternative B: Reduced Density	Alternative C: San Ramon Way Access
E.5, Tribal Cultural Resources			
Impact TC-1: The proposed project may result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074. (LSM)	NI <	LSM =	LSM =
E.9, Greenhouse Gas Emissions			
Impact C-GG-1: The proposed project would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions. (LTS)	NI <	LTS <	LTS =
E.10, Wind			
All impacts LTS	NI <	LTS <	LTS =
E.11, Shadow			
All impacts LTS	NI <	LTS <	LTS =
E.12, Recreation			
All impacts LTS	NI <	LTS <	LTS =
E.13, Utilities and Service Systems			
All impacts LTS	NI <	LTS <	LTS =
E.14, Public Services			
All impacts LTS	NI <	LTS <	LTS =
E.15, Biological Resources			
All impacts LTS	NI <	LTS =	LTS =
E.16, Geology, Soils, and Paleontological Resources			
Impact GE-6: The proposed project could directly or indirectly destroy a unique paleontological resource or site. (LSM)	NI <	LSM =	LSM =
Impact GE-6: Paleontological resources (LSM)	NI <	LTS =	LTS =

Impact of Proposed Project Options[a]	Alternative A: No Project	Alternative B: Reduced Density	Alternative C: San Ramon Way Access
E.17, Hydrology and Water Quality			
All impacts LTS	NI <	LTS =	LTS =
E.18, Hazards and Hazardous Materials			
All impacts LTS	NI <	LTS =	LTS =
E.19, Mineral Resources, E.21, Agriculture and Forestry Resources, and E.22, Wildfire			
All impacts NI	NI =	NI =	NI =
E.20, Energy			
All impacts LTS	NI <	LTS <	LTS =

CEQA SIGNIFICANCE DETERMINATION:

NI = No Impact; LTS = Less than significant; LSM = Less than significant with mitigation; SUM = Significant and unavoidable with mitigation; SU = Significant and unavoidable. All SUM and SU impacts are shown in **bold**.

= (equal to); < (less than); > (greater than); ≤ (less than or equal to)

NOTE:

[a] See SEIR Chapter 3 and Appendix B for complete impact statements.

6.E Alternatives Considered but Rejected

Potential project alternatives were considered as part of the alternatives screening process for this SEIR. As stated in CEQA Guidelines section 15126.6(f)(1), factors that may be considered when a lead agency is assessing the feasibility include:

> … site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.

Potential alternatives were identified from review of scoping comments received following issuance of the Notice of Preparation. The alternatives considered but rejected and the reasons they have been rejected from further analysis are described below.

6.E.1 Alternatives Identified During Scoping

During the scoping process for this SEIR and initial study, individuals and organizations raised concerns regarding the need to consider alternatives to the proposed project as summarized in Chapter 1, Introduction, Table 1-1, Summary of Scoping Comments, p. **Error! Bookmark not defined**.. The concepts raised during scoping included: (1) a reduced intensity (both height and density) alternative, (2) San Ramon Way connection alternative, (3) alternative location, (4) higher-density alternative, and (5) alternative uses. Two of these concepts have been incorporated into the selected alternatives and are analyzed in Section 6.C, p. 6-12. The first concept is addressed under Alternative B, Reduced Density Alternative; and the second concept is addressed under Alternative C, San Ramon Way Access Alternative. The remaining concepts were considered but rejected, as discussed below.

6.E.2 Alternatives Considered but Rejected

Alternative Location

CEQA Guidelines section 15126.6(f)(2) states that alternative locations should be considered if they would avoid or substantially lessen any of the significant effects. While an alternative location might lessen or avoid the operational impacts associated with transportation and circulation and construction impacts associated with noise and air quality, it was rejected from further consideration because the project objectives are specific to the Balboa Reservoir site, based on policy considerations evaluated by the city. Moreover, no feasible alternative locations within the Balboa Park Station Area Plan area exist for an equivalent or similar level of housing development, including affordable housing. No comparable parcel of land is available within the plan area the project sponsor could reasonably acquire, control, or otherwise have access. An alternative location would not be consistent with the project objectives related to developing the reservoir site with a mixed-use residential neighborhood, including a substantial number of affordable housing units; would not replace site infrastructure; or provide bicycle and pedestrian

connections. Furthermore, an alternative location would not meet the project objective related to developing an underutilized site under the Public Land for Housing program. One site identified under the Public Land for Housing in the plan area includes the Balboa Park Station Upper Yard; however, a developer was selected in 2016 and the 2-acre site is slated for the construction of 80 to 120 residential units, which is an order of magnitude smaller than the proposed project. For these reasons, an alternative location was rejected from further consideration.

Higher Density Alternative

Variations of a higher density alternative were raised during the scoping process for this SEIR. A higher density alternative could meet all project objectives, however, this alternative would not address any of the significant and unavoidable environmental impacts and would increase or worsen such impacts due to the larger scale of development. Therefore, this alternative was rejected from further consideration.

Alternative Uses

Open Space Only Alternative

This alternative would develop the project site with only open space uses, and no residential uses. The Open Space Only Alternative was rejected from further consideration because it would not meet most of the key project objectives related to providing housing to address citywide demand for housing, and building a mixed-income community including affordable units.

Fully Affordable Housing Alternative

This concept was raised during the scoping period for the SEIR. A Fully Affordable Housing Alternative would include 100 percent affordable housing at the project site. A 100 percent affordable housing alternative would not meet the project objectives to provide housing options for a range of income levels. This alternative was considered but would not eliminate the significant, unavoidable construction-related air quality and operational loading impacts of the proposed project options, assuming a comparable number of dwelling units; or reduce other impacts of the proposed project options that are less than significant with mitigation. As described in SEIR Chapter 2, a total of up to 50 percent of the new units would be designated affordable to persons earning between 55 and 120 percent of the area median income, depending on market surveys, funding source restrictions and other stakeholder input on the affordable housing plan. The proposed project options, as well as Alternative C, San Ramon Way Access, would aim to maximize housing on the project site.

Use Site for City College

This concept was raised during the scoping period for the SEIR and was suggested in the context of concerns with housing for teachers and students, and loss of parking at the site. Concepts for the site included using the project site entirely for future expansion of City College facilities; and maintaining the majority of parking at the site and providing student or teacher housing. These alternatives were considered but would not necessarily eliminate the significant, unavoidable construction-related air quality and operational loading impacts of the proposed project options;

or reduce other impacts of the proposed project options that are less than significant with mitigation. These alternatives also would not meet project objectives to implement the goals of the Public Lands for Housing Program, and would not provide a mixed-income community with a substantial amount of new housing to address citywide demand for housing. Furthermore, the project site is under the jurisdiction of the SFPUC and not part of City College property or planned for development under their facilities master plan.

Water Storage

This concept was raised during the scoping period for the SEIR and would develop the site for water storage only. This alternative could potentially eliminate the significant, unavoidable construction-related air quality and noise impacts and operational loading impacts of the proposed project options; and reduce other impacts of the proposed project options that are less than significant with mitigation. However, this alternative was rejected from further consideration because it would not meet most of the key project objectives related to providing housing to address citywide demand for housing, and building a mixed-income community including affordable units. San Francisco's drinking water is supplied by 13 reservoirs and seven tanks that store 440 million gallons, and the Balboa Reservoir site does not contribute in any way to water supply or storage, as it is not and never was a functioning reservoir as was originally intended and planned for the site.

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