

SECTION 5. ALTERNATIVES ANALYSIS

5.1 INTRODUCTION

This chapter addresses alternatives to the proposed project, describes the rationale for including them in the EIR, discusses the environmental impacts associated with each alternative, compares the relative impacts of each alternative to those of the proposed project, and discusses the relationship of each alternative to the project objectives.

5.2 CRITERIA FOR SELECTING ALTERNATIVES

An EIR need not consider every conceivable alternative to a project. According to the CEQA Guidelines, an EIR must describe a “reasonable range of alternatives” to a proposed project. The alternatives selected for comparison should be those that would attain most of the basic objectives of the project and avoid or substantially lessen one or more significant effects of the project (CEQA Guidelines Section 15126.6). The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the decision-making body and informed public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines “feasible” to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

An EIR must evaluate the comparative merits of the alternatives and identify an environmentally superior alternative. The EIR must also briefly describe the rationale for selection and rejection of alternatives and the information upon which the Lead Agency (in this case, the City of Calexico) relied on when making the selection. It also should identify any alternatives considered but rejected as infeasible by the Lead Agency during the scoping process and briefly explain the reasons for the exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects. This chapter identifies and evaluates three alternatives to the proposed project.

An EIR must briefly describe the rationale for selection and rejection of alternatives. The Lead Agency may make an initial determination as to which alternatives are feasible and which are infeasible, therefore providing merit to in-depth consideration for those selected for additional analysis. After consideration of various alternatives, the following were selected for evaluation: the No Project/No Development Alternative, the Industrial Use Alternative and the Reduced Project Alternative. These alternatives were selected for their potential to reduce project impacts, particularly significant project impacts. The alternatives addressed in this EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would accomplish most of the basic objectives of the project;
- The extent to which the alternative would avoid or lessen any of the identified significant environmental effects of the project;

- The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, general plan consistency, and consistency with other applicable plans and regulatory limitations;
- The appropriateness of the alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice; and
- The requirement of the *CEQA Guidelines* to consider a “no project” alternative; and to identify an “environmentally superior” alternative in addition to the no-project alternative (*CEQA Guidelines* Section 15126.6(e)).

Alternatives are ultimately compared to the goals of the project. The objectives for the proposed project, listed in Chapter 2, Project Description, are as follows:

- Create an upscale big-box retail center mixed with more conventional large scale retail tenant uses.
- Create an aesthetically attractive, high-quality design that reflects the property’s location as one of the first landmarks within view when crossing the border from Mexico into the US.
- Provide a high level of accessibility to and through the site to ensure a pedestrian environment and efficient vehicular access.
- Enhance the economic vitality of the City by providing sales tax and other revenue opportunities.
- Create jobs for the local economy.

5.3 ALTERNATIVES CONSIDERED BUT REJECTED

The Lead Agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are clearly infeasible. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (*CEQA Guidelines*, Section 15126.6(f)(3)). This section identifies alternatives considered by the Lead Agency, but rejected as infeasible, and provides a brief explanation of the reasons for their exclusion. As noted above, alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects (*CEQA Guidelines*, Section 15126.6(c)).

An alternative site for the project need not be considered when its implementation is “remote and speculative” such as the site being out of the purview of the lead agency or beyond the control of a project applicant.

The *CEQA Guidelines* Section 15126.6(f)(2) specifies that the key question with alternative sites is “whether any of the significant effects of the project would be avoided or substantially lessened by putting the project at another location.” While other large areas of land could be found, based on the known

general conditions in the area and the magnitude of the proposal, an alternative site in the area would have the same or similar significant impacts after mitigation as the project. Given the nature of the proposed project in creating an aesthetically attractive, high-quality design that reflects the property's location as one of the first landmarks within view when crossing the border from Mexico into the US and considering the project objectives, locating the proposed project on another site would be impractical and infeasible. More importantly, this Phase 2 project "builds" upon the ongoing construction and subsequent operation of the Phase 1 development.

5.4 DESCRIPTION AND ANALYSIS OF ALTERNATIVES

This EIR evaluates the following three alternatives:

- The No Project/No Development Alternative; According to the *CEQA Guidelines*, Section 15126.6(e), the purpose of evaluating the No Project/No Development Alternative is to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project. However, the No Project/No Development Alternative is not the baseline for determining whether the proposed project's impacts are significant, unless it is identical to the existing environmental setting analysis that establishes the baseline.
- The Industrial Use Alternative. The Industrial Use Alternative assumes that the project site would be developed with industrial uses rather than commercial uses as proposed; and,
- The Reduced Density Alternative. The Reduced Density Alternative assumes that the site would be developed with a less intense version (reduced square footage) of the proposed project, not to exceed 60% of the square footage of the proposed project.

The discussion of the No Project/No Development Alternative normally proceeds along one of two lines. When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the No Project/ No Development Alternative will be the continuation of the plan, policy, or operation into the future. On the other hand, if the project is an individual development project on an identifiable location, the No Project/No Development Alternative should compare the environmental effects of the property remaining in its existing state. If other future uses of the land are predictable, such land uses should also be discussed as possible no project conditions and the project should be compared to those uses. For each of the project alternatives identified, a general description of the alternative is presented and a qualitative discussion of its comparative environmental impacts is provided.

5.4.1 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT ALTERNATIVE

The *CEQA Guidelines* (Section 15126.6(e)(3)(B)) provides the following guidance on the No Project Alternative, "If the project is...a development project on identifiable property, the no project alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved." Under the No Project/No Development Alternative, the project would not be built and the existing uses within the project site would remain in its present condition. No

significant upgrades to the circulation system or utility infrastructure are anticipated. Under the No Project/No Development Alternative, the proposed project would not be constructed and the existing vacant land would remain. The potential impacts of this alternative are described below.

- ***Air Quality.*** No new short-term (construction) or long-term (operational) air pollutant emissions would occur as a result of the No Project/No Development Alternative. This alternative also would not result in an increase in emissions from a much greater level of traffic associated with the proposed project. The No Project/No Development Alternative would continue to result in fugitive dust generation associated with the barren top soil.
- ***Biological Resources.*** Under the No Project/No Development Alternative, land disturbance resulting from the proposed project would not occur. The project site has been disturbed by previous uses, this alternative would result in no change to biological resources at the project site. Under this alternative, the project site landscape would remain unchanged and its present condition and no impact to biological resources would occur. As a result, the No Project/No Development Alternative would avoid or substantially lessen the significant impacts to biological resources in comparison to the proposed project.
- ***Cultural Resources.*** The No Project/No Development Alternative would not disturb the current condition of the project area, and thus, would not unearth any known or unknown historic, archeological, or paleontological resources that might be present. This alternative would not involve excavation and or grading activities that could potentially disturb the subsurface. Thus, the No Project/No Development Alternative, when compared to the proposed project, would have fewer potential impacts to cultural resources.
- ***Energy Conservation.*** The No Project/No Development Alternative would not consume any additional energy. No water, electricity, or natural gas would be needed were the project not to be developed. This alternative would have no energy impacts, thus, it would have fewer impacts than the proposed project.
- ***Greenhouse Gas Emissions.*** The No Project/No Development Alternative would not result in an increase in emissions from a much greater level of traffic associated with the proposed project and would not result in an increase in greenhouse gas emissions (GHG). As a result, the No Project/No Development Alternative would avoid or substantially lessen the significant impacts to GHG emissions as compared to the proposed project.
- ***Hazards and Hazardous Materials.*** Under the No Project/No Development Alternative, no potential exposure to hazards associated with the routine transport, use, or disposal of hazardous materials would occur. The No Project/No Development Alternative would not result in impacts associated with the exposure of people to hazardous materials. The proposed project would introduce small amounts of hazardous materials on both a short-term basis (i.e., during construction) and in the long-term through the use and storage of household hazardous materials by commercial businesses that would occupy the site. However, the proposed project's potential

hazardous materials impacts would be mitigated to levels considered less than significant. Still, the No Project/No Development Alternative would have fewer impacts than the proposed project.

- *Hydrology and Water Quality.* The No Project/No Development Alternative would not result in any substantial changes to the hydrologic conditions or to water quality near the project site. Under this alternative, there would be no increased impacts or changes to the existing drainage patterns or volume of storm water runoff compared to the proposed project. Flood hazards would remain unchanged from current conditions. The comprehensive surface drainage/storm drain system to collect and convey runoff on the project site would not be constructed. The No Project/No Development Alternative would have reduced impacts to surface water quality as the amount of new impervious surface created would be much greater under the proposed project. Thus, in comparison, the No Project/No Development Alternative would result in fewer impacts such as increased surface runoff and degraded water quality.
- *Land Use and Planning.* Under this alternative, no change would occur to the existing conditions at the project site and an amendment to the General Plan to change the land use designation of the project site would be necessary. Because no change to the existing land use or land use plans and policies related to the project site would occur, this alternative would have no direct impact on land use at the site or in the vicinity. Impacts would be reduced as compared to the proposed project.
- *Noise.* The No Project/No Development Alternative would not result in any change to existing ambient noise levels and would not introduce a new source of noise. Because no construction or business operations would take place and because traffic related to the project site would be insubstantial or non-existent, traffic-related noise attributable to the project site would also be insubstantial or non-existent. This alternative would result in no impact related to noise at or in the vicinity of the project site. Therefore, the No Project/No Development Alternative would have fewer noise impacts than the proposed project.
- *Transportation.* Under the No Project/No Development Alternative, the project-related increase in vehicle trips on the surrounding roadway network from proposed project construction and operation would not occur. The No Project/No Development Alternative would not result in changes to traffic, congestion on roadways, air traffic patterns, traffic hazards, inadequate emergency access, or inadequate parking. In addition, the No Project/No Development Alternative would not conflict with policies, plans, or programs supporting alternative transportation. The changes in traffic patterns from proposed project operations would not occur and associated project specific mitigation measures would not be required. As a result, the No Project/No Development Alternative would have no impact on transportation or traffic. Therefore, the No Project/No Development Alternative would have significantly fewer impacts regarding traffic and transportation as compared to the proposed project.

- *Utilities.* The No Project/No Development Alternative would not result in a new need for utilities at the project site. Most utilities are available at the project site (from the Phase 1A and Phase 1B development) and they are currently not in use. The proposed project would contribute toward increased sewer service demands beyond projected treatment capacity, thus requiring mitigation fees for expanding the capacity of the wastewater treatment plant. The No Project/No Development Alternative would have no impact on water supplies, water or wastewater treatment facilities, new or existing storm water drainage facilities, or a substantial impact on solid waste facilities. Impacts to utilities and services would be fewer than the proposed project.
- *Urban Decay.* The No Project/No Development Alternative will not involve any development that could result in a decrease in the sales of nearby retailers, and thus, would not be the reason for store closures in the market area. The No Project/No Development Alternative would not cause urban decay and the impacts from the Industrial Use Alternative related to urban decay would be less than the proposed project.

The No Project/No Development Alternative would avoid or substantially lessen all of the potential direct and cumulative significant impacts of the proposed project. However, this alternative would not meet any of the project goals or objectives including the goals and objectives of the project applicant to build a commercial shopping center that serves the local community and that is economically sustainable and provides employment and shopping opportunities for residents. The No Project/No Development Alternative would not provide the City with the social and economic benefits of expanded commercial facilities and amenities. The project site would remain in an undeveloped and would not help to meet the City's goals, as expressed in the project objectives. Because the No Project/No Development Alternative would not meet any of the project objectives, it would be considered infeasible.

5.4.2 ALTERNATIVE 2: INDUSTRIAL USE ALTERNATIVE

Under this Alternative, the project site would be developed as an industrial use under the General Industrial zoning classification. The existing General Plan and Calexico Zoning designations would remain in place. No industrial uses would be developed on the small portions of the project site zoned Commercial Highway (CH). According to Chapter 17.07 of the Municipal Code, the maximum lot coverage allowed in Industrial zones is 60 percent; however, it would be assumed that the extent and phasing of the industrial development would be the same as the proposed project constructed over two phases of development). The potential impacts of this alternative are described below.

- *Air Quality.* The Industrial Use Alternative would result in new short-term and long-term operational air pollutant emissions, including greenhouse gases. These emissions would occur as a result of development consistent with an industrial use. While overall traffic volumes associated with this alternative would be less than the proposed project, it is assumed that truck traffic and related emissions would increase over the proposed project. In addition, there may be an increase in pollutant emissions from certain manufacturing processes allowed under the General Industrial zoning classification. It is anticipated that this alternative would have similar if not greater air quality impacts as compared to the proposed project.

- *Biological Resources.* Under this alternative, land disturbance and increased human activity resulting from development of an industrial use would occur to an extent and in a manner similar to the proposed project. Construction activities from this alternative would have similar impacts as the proposed project. As a result, the Industrial Use Alternative would have comparable impacts to biological resources as compared to the proposed project.
- *Cultural Resources.* Both the proposed project and this alternative would potentially unearth other significant cultural resources. This alternative would involve substantial excavation and grading activities that could potentially disturb the subsurface. As with the proposed project, this alternative would require mitigation measures that address the accidental discovery of archaeological resources and/or previously unidentified human remains. Thus, the proposed project and the Industrial Use Alternative would have similar impacts on cultural resources.
- *Energy Conservation.* The Industrial Use Alternative would have fewer impacts than the proposed project on energy conservation. An industrial use would attract substantially fewer vehicular trips than a retail shopping center. The project's use of diesel and gasoline would be much greater than this alternative. The proposed project and the Industrial Use Alternative would likely have similar electricity and natural gas consumption levels, but the diesel and gasoline usage from the project would imply it would have much greater impacts regarding energy usage than the Industrial Use Alternative.
- *Greenhouse Gases.* The Industrial Use Alternative would greatly decrease the amount of greenhouse gas emissions. Retail generates a considerably larger number of vehicular trips than industrial uses. Vehicular trips account for approximately 95 percent of the GHG emissions produced by the proposed project. As industrial uses would induce a substantially smaller number of vehicular trips to the project site, the Industrial Use Alternative would emit a substantially smaller amount of GHG than the proposed project.
- *Hazards and Hazardous Materials.* The proposed project is anticipated to introduce additional hazardous materials to the site in the short-term (i.e. during construction) and in the long-term through the use and storage of households hazardous materials by commercial businesses. However, the proposed project's potential hazardous materials impacts would be mitigated to less than significant. Under the Industrial Use Alternative, future industrial uses on-site could potentially involve the use of hazardous materials. The Industrial Use Alternative, like all proposed developments, would be required to comply with State laws and City Municipal Code restrictions that regulate and control the use of those materials handled on-site. Still, industrial development under this alternative could potentially introduce more new sources of hazardous materials to the project site and would, therefore, be considered to have greater hazardous and or hazardous material impacts as compared to the proposed project.
- *Hydrology and Water Quality.* Development under the Industrial Use Alternative would result in changes to hydrology and water quality from the site's current conditions. The Industrial Use Alternative would result in impervious surfaces that would be comparable to the proposed project

given the amount of paving required for parking, loading and access. Under this alternative, there would be similar impacts to the existing drainage patterns and to the volume of storm water runoff when compared to the proposed commercial center project. Impacts related to flood hazards would also be similar. This alternative would have similar impacts to hydrology and surface water quality as compared to the proposed project.

- **Land Use and Planning.** Under the Industrial Use Alternative, the project site would be developed into an industrial use. Neither a zone change nor a General Plan Amendment would be required to accommodate the industrial use. Therefore, the Industrial Use Alternative would have fewer impacts related to land use plans and policies, given its consistency with the existing General Plan land use designation, than the proposed project.
- **Noise.** The Industrial Use Alternative would likely result higher operational noise levels as compared to the proposed project. Industrial uses generally include a significant amount of stationary noise sources. However, the number of vehicle trips under this alternative would be less than what is predicted for the proposed project, resulting in less traffic noise as compared to the proposed project. Thus, noise impacts from this alternative would be comparable to the proposed project.
- **Transportation.** With development under the Industrial Use Alternative, an increase in vehicle trips on the surrounding roadway network could occur. However, this increase would not be as great as the projected increase from the proposed project when applying lot coverage and floor area ratios allowed under the General Industrial zoning classification. Still, changes in traffic patterns from this alternative would require project specific mitigation measures, specifically regarding the improvements and widening of West Second Street, as with the proposed project. However, since traffic under this alternative would not increase to the same levels as with the proposed project, the Industrial Use Alternative would require fewer improvements overall to the area's street network. Thus, the Industrial Use Alternative would have fewer impacts regarding traffic and transportation than the proposed project.
- **Utilities.** The proposed project would result in less-than-significant impacts with mitigation to utilities and service systems. In addition, the proposed project includes multiple measures to reduce energy usage. The Industrial Use Alternative would result in construction of an industrial use. Assuming the industrial use is not food manufacturing, this alternative would result in less demand for wastewater treatment, electricity, gas, and other service systems. Energy-saving measures included as part of the proposed project would also be included in this alternative, where applicable. The Industrial Use Alternative would therefore result in less demand for utilities and service systems than the proposed project.
- **Urban Decay.** The Industrial Use Alternative does not include any retail or commercial uses. It would not cause a decrease in the sales of nearby retailers, and thus, would not be the reason for store closures in the market area. The Industrial Use Alternative would not cause urban decay and

the impacts from the Industrial Use Alternative related to urban decay would be less than the proposed project.

The Industrial Use Alternative would substantially lessen the project's significant impacts on traffic. The Industrial Use Alternative would meet some of the project objectives, including providing new jobs and new revenue sources (sales tax and property tax) for the City. The Industrial Use Alternative would be consistent with the existing General Plan and Zoning land use designation for the site and would not require a plan amendment or zone change. Impacts to air quality and the introduction of hazardous materials would be comparable to and possibly greater than the proposed project. Although the Industrial use Alternative would meet some of the project objectives, including providing new jobs and new revenue sources for the City, it would not necessarily result in a high quality design at one of the City's prominent gateways, nor would this alternative include a vibrant retail center. Impacts to air quality, demand for utilities, and the introduction of hazardous materials would likely increase with this alternative as compared to the proposed project; traffic impacts would decrease.

5.4.3 ALTERNATIVE 3: REDUCED DENSITY ALTERNATIVE

The Reduced Density Alternative would result in less developed space at the retail commercial center. Under the Reduced Density Alternative, the retail commercial center would not exceed 60 percent of the development proposed as part of the project. Development would still occur over two phases. This alternative would result in less impervious surface as compared to the proposed project and thus would have less impact from storm water runoff. Like the proposed project, the Reduced Density Alternative would still require development review, approval of a tentative subdivision track map and overall project approval. The potential impacts of this alternative are described below.

- *Air Quality.* The proposed project would result in significant and unavoidable air quality impacts during construction (ROG) and cumulative air quality criteria pollutants impacts. The Reduced Density Alternative would result in significant and unavoidable impacts to air quality, but likely to a lesser degree than the proposed project, as this alternative would generate less traffic than the proposed project. As with the proposed project, this alternative would also result in significant cumulative air impacts. As the proposed project includes more building development and would result in a greater traffic increase, development under the Reduced Density Alternative would result in fewer impacts to air quality.
- *Biological Resources.* The project site has been disturbed by previous development. Land disturbance and increased human activity similar to that of the proposed project would occur with development under the Reduced Density Alternative. Construction activities from the Reduced Density Alternative would also affect biological resources in a similar manner. As a result, the Reduced Density Alternative would have comparable impacts to biological resources when evaluated against the proposed project and would require the same mitigation measures.

- *Cultural Resources.* No cultural resources have been identified at the project site. As with the proposed project, this alternative would require the same mitigation measures that address the accidental discovery of archaeological resources and/or previously unidentified human remains. The Reduced Density Alternative would therefore have similar impacts as the proposed project and would require the same mitigation measures.
- *Energy Conservation.* The Reduced Density Alternative would develop 40 percent less retail use area. The energy requirements for the retail center in this alternative would decrease by the same amount. The Reduced Density Alternative would therefore have a lesser impact as compared to the proposed project.
- *Greenhouse Gases.* The proposed project would result in the release of GHG emissions. Smaller than the proposed project, the Reduced Density Alternative would likely also result in some impacts regarding GHG emissions, both for construction and operations, and its cumulative contribution. However, overall, as compared to the proposed project, this alternative would attract fewer vehicular trips and thus, result in a reduction of GHG emissions.
- *Hazards and Hazardous Materials.* The Reduced Density Alternative would result in new construction at the project site that would result in additional soil disturbance, excavation, and trenching (compared to the proposed project). Soil disturbance could result in exposing construction workers to the same potential hazards and hazardous materials identified for the proposed project. These potential hazardous materials include pesticides and herbicides in the soil. Similar to the proposed project, this alternative would result in the use and disposal of small amounts of commercial hazardous products (cleaners, solvents) but to a lesser degree. The same mitigation measures required for the project would be required for the Reduced Density Alternative. The Reduced Density Alternative could, however, result in less commercial hazardous waste and is considered to have slightly fewer impacts than the proposed project.
- *Hydrology and Water Quality.* As with the proposed project, the Reduced Density Alternative would result in more impervious surface area at the project site than currently exists. However, reducing the total square footage and redesigning the layout could provide greater areas for storm water percolation. Under this alternative, the impacts to the existing drainage patterns and to the volume of storm water runoff would be less as compared to the proposed project. A comprehensive surface drainage/storm drain system would still have to be developed to collect and convey runoff from the project site; however, impacts to receiving surface waters would be less due to reduced runoff volumes. The same and or similar mitigation measures required for the proposed project would also be required for this alternative to reduce non-point source pollution in storm water runoff. This alternative would have less of an impact to surface water quality when compared to the proposed project.
- *Land Use and Planning.* The Reduced Density Alternative would not include the proposed buildings adjacent to 2nd Street per the proposed project. Similar to the proposed project, this alternative would not physically divide an established community or conflict with habitat

conservation plans or natural community conservation plans. This alternative would still require a General Plan amendment and rezoning to allow the development. Overall, the Reduced Density Alternative would be considered to be more consistent with local land use planning documents and regulations than the proposed project due to airport land use compatibility issues.

- *Noise.* This alternative would result in less building development, and the associated construction-related noise and operational noise would be reduced in the project site vicinity proportionally as compared to the proposed project. The number of vehicle trips under this alternative would be less than what is predicted for the proposed project, resulting in less traffic-related noise as compared to the proposed project. The contribution of the Reduced Density Alternative to ambient noise levels and to cumulative noise increases would be less than the proposed project because the amount of the development would result in fewer delivery trucks and other similar noise sources. This alternative would have fewer noise impacts as compared to the proposed project.
- *Transportation.* Under the Reduced Density Alternative, an increase in vehicle trips on the surrounding roadway network would occur. However, this increase would not be as great as the projected traffic increase from the proposed project. Changes in traffic patterns would be similar to those associated with proposed project operations, and many of the associated project-specific mitigation measures would still be required. The Reduced Density Alternative would be considered to have fewer impacts regarding traffic this alternative would induce fewer new peak hour trips as compared to the proposed project.
- *Utilities.* Development under the Reduced Density Alternative would result in a reduced amount of commercial uses as compared to the proposed project. Solid waste generation, water supply demand and wastewater generation at the project site would increase over existing conditions but to a lesser degree than the proposed project. Thus, this alternative would likely need fewer infrastructure connections, power, and solid waste services than the proposed project. Therefore, the potential impacts to utilities would be less under this alternative than under the proposed project.
- *Urban Decay.* As the Reduced Density Alternative decreases the amount of retail use by 40 percent, the sales impact to the market area would decrease as well. Fewer stores would close and it is less likely that a physical deterioration of vacant storefronts would occur. The Reduced Density Alternative would be less likely to cause urban decay than the proposed project.

The Reduced Density Alternative would meet many of the project objectives, including provision of new sales tax revenue for the City, a vibrant retail center, and a high-quality design at one of the City's gateways. In general, the Reduced Density Alternative would result in fewer impacts on the environment than the proposed project for all resource areas except biological and cultural resources, where the impacts would be similar. This alternative also would meet all the goals and objectives of the proposed project; however, the revenue generated would be proportionally less than that of the proposed project.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR must identify the environmentally superior alternative. The No Project/No Development Alternative would be environmentally superior to the proposed project based on the minimization or avoidance of physical environmental impacts. However, the No Project/No Development Alternative does not meet any of the project objectives. In addition, *CEQA Guidelines* (Section 15126.6(c)) require that, if the environmentally superior alternative is the No Project/No Development Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. As provided in Section 15126.6(d) of the *CEQA Guidelines*, the significant effects of each alternative are identified in less detail than the proposed project. A summary comparison of the potential impacts associated with the alternatives and the proposed project is provided in Table 5-1 below.

**Table 5-1
 Comparison of Project Alternative Impacts to Project Impacts**

No Development/No Project Alternative	Industrial Use Alternative	Reduced Density Alternative
Air Quality Impacts		
Less than project impacts.	Greater than project impacts	Less than project impacts.
Biological Resources Impacts		
Less than project impacts.	Same as project impacts.	Same as project impacts.
Cultural Resources Impacts		
Less than project impacts.	Same as project impacts.	Same as project impacts.
GHG Impacts		
Less than project impacts.	Greater than project impacts.	Less than project impacts.
Hazards and hazardous Materials Impacts		
Less than project impacts.	Greater than project impacts.	Less than project impacts.
Hydrology and Water Quality Impacts		
Less than project impacts.	Same as project impacts.	Same as project impacts.
Land Use Impacts		
Less than project impacts.	Greater than project impacts.	Same as project impacts.
Noise Impacts		
Less than project impacts.	Greater than project impacts	Less than project impacts.
Transportation and Circulation Impacts		
Less than project impacts.	Greater than project impacts	Less than project impacts.

**Table 5-1
 Comparison of Project Alternative Impacts to Project Impacts**

No Development/No Project Alternative	Industrial Use Alternative	Reduced Density Alternative
Utilities Impacts		
Less than project impacts.	Greater than project impacts	Less than project impacts.
Urban Decay Impacts		
Less than project impacts.	Less than project impacts.	Less than project impacts.

Source: Blodgett/Baylosis Environmental Planning, 2014

As indicated in the above table, the environmentally superior alternative was the No Project Alternative. However, this alternative does not meet the project objectives. However, among the other alternatives, the Reduced Density Alternative would be considered environmentally superior. The Reduced Density Alternative would result in fewer impacts and/or would result in less intense impacts on the environment than the proposed project. This alternative would meet all of the goals and objectives of the proposed project. The development of a commercial shopping center would serve the local community and would provide employment and shopping opportunities for residents and visitors. However, the Reduced Density Alternative would not generate as many jobs as the proposed project and would not be as large a tax revenue source for the City. The proposed project would accomplish the City’s goals for job creation and tax revenues in a more substantial way.

