

5.1 Introduction

The California Environmental Quality Act (CEQA) (Public Resources Code [PRC], Section 21000 *et seq.*) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 *et seq.*) require that an environmental impact report (EIR) “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” (CEQA Guidelines Section 15126.6[a]). If mitigation measures or a feasible project alternative that would meet most of the basic project objectives would substantially lessen the significant environmental effects of a proposed project, then the lead agency should not approve the proposed project unless it determines that specific technological, economic, social, or other considerations make the mitigation measures and the project alternative infeasible (PRC Section 21002, CEQA Guidelines Section 15091[a][3]). The EIR must also identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and should briefly explain the reasons underlying the lead agency’s determination (CEQA Guidelines Section 15126.6[c]).

One of the alternatives that must be analyzed is the No-Project Alternative. The No-Project Alternative analysis must discuss the existing conditions when the notice of preparation (NOP) is published. The analysis must also address conditions that would be reasonably expected to occur in the foreseeable future if the project were not approved and development continued according to existing plans and supported by available infrastructure and community services (CEQA Guidelines Section 15126.6[e][2]). Therefore, pursuant to the CEQA Guidelines, this section discusses and analyzes a No-Project Alternative.

The Reduced-Intensity Alternatives are introduced here and described together with the 1300 El Camino Real Greenheart Project (Project) and the No-Action Alternative. Significant impacts of the alternatives are compared to the significant environmental impacts of the Project as proposed.

Section 15183.3 of the CEQA Guidelines states that the analysis in an Infill EIR need not address alternative locations, densities, or building intensities. However, the City of Menlo Park (City) has elected to evaluate a range of alternatives as they relate to the allowable base-level development standards in the El Camino Real/Downtown Specific Plan (Specific Plan); alternative densities and building intensities are considered below. This analysis does not, however, consider alternative locations for the Project.

5.2 Description of Alternatives Considered

As discussed in Chapter 2, *Project Description*, the Greenheart Land Company (Project Sponsor) has identified the following Project objectives that are relevant to the physical impacts considered in this document:

- Develop a mixed-use, infill project on El Camino Real that is consistent with the goals and vision of the Specific Plan, which seeks to improve underutilized and vacant lots, focus high-density development in proximity to the train station, and enrich El Camino Real as a vibrant pedestrian- and transit-oriented corridor.

- Redevelop underutilized parcels with an economically viable mixed-use project that includes multi-family residential, office, and community-serving uses.
- Provide a mix of uses that is close to transit and services, including transportation demand management amenities that reduce vehicle trips and promote walking, biking, carpooling, and transit use.
- Use green design practices and methods that promote energy efficiency and resource conservation.
- Create a mixed-use project that conforms to the design principles set forth in the Specific Plan and that respects the surrounding neighborhood through appropriate building height, siting, and massing.
- Provide new and diverse employment opportunities for City residents.
- Generate revenue for the City and other public entities.

As stated above, the alternatives to a proposed project are meant to feasibly attain most of the basic project objectives while avoiding or substantially lessening its significant impacts. Significant and unavoidable Project-specific and cumulative impacts from the Project are listed below.

Project-Level Impacts

- **Impact TRA-1: Impacts on Intersections under Near-Term 2020 plus-Project Conditions.** Increases in traffic associated with the Project under near-term 2020 plus-Project conditions would result in increased peak-hour delays at five intersections. Intersection impacts at the four of the five intersections would remain significant and unavoidable because improvements would require obtaining additional rights-of-way, would violate existing City/town policies, or would be outside the City's jurisdiction.
- **Impact TRA-2: Impacts on Roadway Segments under Near-Term 2020 plus-Project Conditions.** Increases in traffic associated with the Project under near-term 2020 plus-Project conditions would result in increased ADT volumes on area roadway segments.
- **Impact TRA-3: Impacts on Routes of Regional Significance under Near-Term 2020 plus-Project Conditions.** Increases in traffic associated with the Project under near-term 2020 plus-Project conditions would result in significant impacts on several Routes of Regional Significance.

Cumulative Impacts

- **Impact C-TRA-4: Impacts on Intersections under Cumulative 2040 plus-Project Conditions.** Increases in traffic associated with the Project under cumulative 2040 plus-Project conditions would result in increased peak-hour delays at 13 intersections. Intersection impacts at nine of the intersections would be significant and unavoidable because improvements would require obtaining additional rights-of-way, would violate existing City/town policies, or would be outside the City's jurisdiction.
- **Impact C-TRA-5: Impacts on Roadway Segments under Cumulative 2040 plus-Project Conditions.** Increases in traffic associated with the Project under the cumulative 2040 plus-Project conditions would result in increased daily traffic volumes on area roadway segments.

- **Impact C-TRA-6: Impacts on Routes of Regional Significance under Cumulative 2040 plus-Project Conditions.** Increases in traffic associated with the Project under cumulative 2040 plus-Project conditions could result in significant impacts on several Routes of Regional Significance.

No-Project Alternative

Under the No-Project Alternative, the existing parcels would remain as-is. The six buildings and associated parking areas would remain at the Derry Lane Site. Of these six buildings, three are operational (as a dance studio, car wash, and Foster's Freeze), and three are currently vacant.¹ It is assumed that due to the deteriorated nature of the vacant buildings, they are not likely to be retenanted. There are no existing buildings at the 1300 El Camino Real Site, but the building foundations of the demolished buildings and associated parking surfaces remain. It is assumed this site would remain vacant and the building foundations and paved surfaces would not be removed. There is one building on the 1258 El Camino Real Site; however this building was vacated in 2010. It is assumed that due to the deteriorated nature of this vacant building, it is not likely to be retenanted.

Reduced-Intensity Alternatives

As discussed above, Reduced-Intensity Alternatives are not required as part of an Infill EIR. The alternatives considered in this analysis were not designed to reduce significant and unavoidable impacts. Instead, these alternatives illustrate densities consistent with the development standards presented in the Specific Plan EIR, at the base-level limits. As shown in Table 3-3 of the Specific Plan EIR base level, land uses in the El Camino Real Northeast – Residential (ECR NE-R) zoning district cannot exceed a floor-area ratio (FAR) of 1.10 for general office or 32 dwelling units per acre for residential uses. As noted earlier, the Project is proposed at the “Public Benefit Bonus” level, which is a discretionary action. If the developer and the City do not agree on the public-benefit topic, then the proposal may be revised to the base level.

Both Reduced-Intensity Alternatives considered would include an aboveground parking structure, three-story residential building, and two-story office buildings. The alternatives depict a base-level maximum FAR and density, which does not include a Public Benefit Bonus. A Public Benefit Bonus is the additional development permitted beyond the base intensity (and/or height, if applicable) for an extra public benefit, above and beyond the inherent positive attributes of a project. The alternatives have been crafted to achieve the overall goals and represent possible community preferences for building types and sizes. The two Reduced-Intensity Alternatives considered would both reduce the Project's overall square footage by 112,000 square feet (sf) from 420,000 sf to 308,000 sf, but each would redistribute the remaining square footage to maximize either office space or residential space.

Base Level Maximum Office Alternative

This alternative allows for a 1.10 FAR, which meets the base density standards of the Specific Plan for the El Camino Real Northeast zoning district. The development standards stipulate that general office space shall not exceed one-half of the base FAR or Public Benefit Bonus FAR. This alternative does not exceed half of the base FAR. More specifically, this alternative would reduce the proposed office square footage by 34,900 sf from 188,900 sf to 154,000 sf and reduce the residential square footage by 63,100 sf from 202,100 sf to 139,000 sf (from 202 units to 139 units). The community-serving area

¹ Although currently vacant, at the time of the release of the Notice of Preparation, Foster's Freeze was operational.

would be reduced by 14,000 sf from 29,000 sf to 15,000 sf. The general layout, as well as ingress and egress, would be the same as the Project.

Base Level Maximum Residential Alternative

This alternative allows for a 1.10 FAR, which meets the development standards of the Specific Plan, with 32 dwelling units per acre, for the El Camino Real Northeast – Residential zoning district. The Base Level Maximum Residential Alternative would increase residential square footage by only 3,900 sf, from 202,100 sf to 206,000 sf (from 202 units to 206 units), and reduce office square footage by 101,900 sf, from 188,900 sf to 87,000 sf. The community-serving area would be reduced by 14,000 sf, from 29,000 sf to 15,000 sf. The general layout, as well as ingress and egress, would be the same as that of the Project.

A summary of the Reduced-Intensity Alternatives as they relate to the Project is presented in Table 5-1.

Table 5-1. Comparison of Project and Reduced-Intensity Alternatives

Scenario	FAR	Total SF	Office (SF)	Residential (SF)	Dwelling Units	Community-Serving (SF)
Project	1.5	420,000	188,900	202,100	202	29,000
Base Level Maximum Office Alternative	1.1	308,000	154,000	139,000	139	15,000
Base Level Maximum Residential Alternative	1.1	308,000	87,000	206,000	206	15,000

FAR = floor area ratio
SF = square feet

5.3 Attainment of Project Objectives

No-Project Alternative

The No-Project Alternative would not meet the primary objectives of improving underutilized and vacant lots, focusing high-density development in proximity to the train station, and enriching El Camino Real as a vibrant pedestrian- and transit-oriented corridor. Instead, the sites would remain underutilized, and existing vacant buildings would continue to deteriorate. The No-Project Alternative would not demolish buildings or remove building foundations and paved surfaces from previously demolished buildings. The No-Project Alternative would not construct office space, community space, or residential units.

Because the proposed buildings would not be constructed, the No-Project Alternative would not achieve a mix of uses that is close to transit and services, provide new and diverse employment opportunities for City residents, or generate revenue for the City and other public entities. As such, the No-Project Alternative would not meet the Project objectives.

Reduced-Intensity Alternatives

As with the Project, both of the Reduced-Intensity Alternatives would demolish the existing buildings and paved features and construct proposed new structures. However, as noted above, each of the Reduced-Intensity Alternatives would reduce overall square footage by approximately 112,000 sf. These alternatives would create new and diverse employment opportunities, improve underutilized and vacant lots, and enrich El Camino Real as a vibrant pedestrian- and transit-oriented corridor, although to a lesser extent than the Project. Since the Reduced-Intensity Alternatives would be in the same location, the Project would still be in a prominent location proximate to the Caltrain station. In addition, the Reduced-Intensity Alternatives would create increased tax revenues for the City, albeit less than the Project.

5.4 Impact Assessment

No-Project Alternative

Transportation

The No-Project Alternative would retain existing conditions at the Project site and would not generate additional traffic or parking demand. This alternative would result in the same net daily vehicle trips and affected intersections as the baseline because no new uses would be added at the Project site. No transportation-related impacts would result with the No-Project Alternative. (NI)

Air Quality

The No-Project Alternative would not construct new land uses at the Project site and would not generate construction air emissions above the baseline. Since no development would occur under the No-Project Alternative, no sensitive receptors would be exposed to localized toxic air contaminant concentrations during construction. No impacts on air quality would result with the No-Project Alternative. (NI)

Noise

The operational noise at the Project site would be similar to noise under existing conditions because vehicle trips and employment at the site would not increase. No noise-related impacts would result from the No-Project Alternative. (NI)

Hazards and Hazardous Materials

Under the No-Project Alternative, no structures would be demolished, and the soil would not be disturbed; therefore, no impact would result relative to the potential release of hazardous materials. Under the No-Project Alternative, construction workers would not be exposed to potential risks from asbestos, lead paint, contaminated soil or groundwater, and ecological receptors would not be exposed to residual contaminants in soil and/or groundwater. Mitigation measures directed at eliminating the release of hazardous materials into the environment would not be necessary. However, as directed by the Department of Toxic Substances Control (DTSC), the No-Project Alternative would still include implementation of the proposed remedial strategy for remedial investigation activities conducted in response to the 2011 DTSC order, as discussed in Section 3.4, *Hazards and Hazardous Materials*. Removal of contaminated soils, particularly if soils are transported for offsite disposal or reuse, could spread contaminants. This could have an impact on the public or the surrounding environment during transport if

the materials are handled incorrectly. However, the transport and disposal of hazardous materials must comply with applicable Department of Transportation regulations and City of Menlo Park General Plan hazardous materials policies. Furthermore, implementation of Mitigation Measure HAZ-1.1 would ensure that any spills would be contained and controlled. Mitigation Measures HAZ-2.1 and HAZ-2.2 would ensure that characterization activities would be conducted in areas where the likelihood of contaminated media exists and that best management practices (BMPs) would be implemented. Therefore, the No-Project Alternative would result in a less-than-significant impact with mitigation on the public or the environment through the routine transport or disposal of hazardous materials. (LTS/M)

Base Level Maximum Office Alternative

Transportation

The Base Level Maximum Office Alternative would most likely result in the same transportation impacts as the Project. The Project is estimated to generate 3,740 net daily trips including 384 trips per AM Peak Hour and 401 per PM Peak Hour. The Base Level Maximum Office Alternative would generate 580 fewer trips per day, including 79 fewer trips per AM Peak Hour, and 98 fewer trips during the PM Peak Hour (Table 5-2). The trip differential for the Base Level Maximum Office Alternative is not enough to result in changes to intersection, roadway, pedestrian, bicycle, or transit impacts when compared to the Project. With the same impacts as the Project, the same mitigation measures detailed in Section 3.1, *Transportation*, would be required. Similar to the Project, impacts to intersections and roadways would be significant and unavoidable. (SU)

Table 5-2. Trip Generation Summary – Base Level Maximum Office Alternative

Land Use	Daily		AM Peak Hour				PM Peak Hour			
	Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Existing Trips to be removed		-775		-6	-3	-3		-53	-28	-25
Maximum Office Alternative										
Apartment	6.95	966	0.52	72	14	58	0.68	94	61	33
Office	11.84	1,823	1.76	270	238	32	1.63	251	43	208
Shopping Center	131.92	1,979	3.27	49	30	19	11.20	168	81	87
Subtotal		4,768		391	282	109		513	185	328
<i>Trip Reduction</i> ¹		-495		-72	-43	-29		-127	-54	-73
<i>Pass-by (retail only)</i> ²		-353		-338	-8	-5		-3	-30	-16
Project Alt. Trips		3,871	3,935		311	234	77		356	115
Net Trip Generation		3,096	3,160		305	231	74		303	87
Project (for comparison)		3,740	3,740		384	283	101		401	126
Net Difference (Project – Project Alternative)		-644	-580		-79	-52	-27		-98	-39

Notes:

Based on methodologies presented in *Trip Generation Handbook, 3rd Edition*, ITE, 2014. Trip Reduction worksheets are enclosed for reference.

A 25% pass-by reduction for retail uses, taken after all of trip reduction rates were applied.

Air Quality

Localized Particulate Matter Emissions During Construction. Diesel-fueled engines, which generate respirable particulate matter with a diameter of 2.5 micrometers or less (PM_{2.5}), would be used during construction of the Base Level Maximum Office Alternative, similar to the Project. Construction of the Base Level Maximum Office Alternative would also result in fugitive (dust) emissions of PM_{2.5} through site disturbance and truck travel. Multiple sensitive receptors are located within 1,500 feet of the Project site.² Since the Base Level Maximum Office Alternative would result in a reduction of building area compared to the Project, these impacts would be less than under the Project. Similar to the Project, construction of the Base Level Maximum Office Alternative would likely result in significant increases in PM_{2.5} concentrations without mitigation, but implementation of Mitigation Measures AQ-1.1, AQ-1.2, and AQ-1.3 would reduce these impacts to a less-than-significant level. Exposure to PM_{2.5} concentrations with implementation of the Base Level Maximum Office Alternative would be less than significant with mitigation, similar to the Project. (LTS/M)

Cumulative Impacts. Implementation of the Base Level Maximum Office Alternative in combination with El Camino Real vehicle traffic and Caltrain emissions, similar to the Project, would result in a less-than-significant cumulative impact for the non-cancer hazard index, cancer risk, and PM_{2.5} concentrations after implementation of mitigation measures. Since the Base Level Maximum Office Alternative would result in a reduction of building area compared to the Project, these impacts would be less than under the Project. Similar to the Project, construction of the Base Level Maximum Office Alternative would likely result in significant increases in cancer risk and PM_{2.5} concentrations without mitigation, but implementation of Mitigation Measures AQ-1.1, AQ-1.2, and AQ-1.3 would reduce these cumulative impacts to a less-than-significant level. (LTS/M)

Noise

Traffic Noise Impacts. The Base Level Maximum Office Alternative would result in a reduction in the development at the site. As such, the total number of vehicle trips generated under this alternative would be reduced compared to the Project. The Base Level Maximum Office Alternative would generate 3,160 net daily vehicle trips, which is 580 fewer daily trips than would be generated with the Project (which would result in 3,740 net daily trips). There would be no impacts related to traffic noise with implementation of the Project. As the Base Level Maximum Office Alternative would reduce the total amount of development and the associated vehicle trips as compared to the Project, impacts related to traffic noise would also be less than significant. (LTS)

Cumulative Impacts. A project would generally result in a significant cumulative traffic noise impact if cumulative plus project noise levels at existing sensitive receivers were greater than the applicable thresholds (60 A-weighted decibels [dBA] average equivalent sound level [L_{DN}] over a 24-hour period for single-family residential land uses). A project would have a cumulatively considerable contribution to the overall increase in traffic noise levels if it would increase cumulative traffic noise levels by greater than 1 dB under cumulative with-Project conditions.

² Although BAAQMD has determined that construction activities occurring at distances of greater than 1,000 feet from a sensitive receptor likely do not pose a significant health risk, receptors out to 1,500 feet were identified to capture the health risks at the nearest schools, daycare facilities, etc.

Modeling results for cumulative plus Project traffic noise levels indicated that cumulative traffic noise would be in excess 60 dBA L_{DN} at a distance of 50 feet for 7 of the 14 analyzed roadway segments in the vicinity of the Project site. The Base Level Maximum Office Alternative would result in 3,160 net daily trips, or 580 trips fewer than the number generated by the Project (3,740 net daily trips); this is an approximately 15-percent reduction in traffic. A 15-percent reduction in traffic, however, would only reduce traffic noise levels by less than 1 decibel (dB), and all segments with cumulative noise impacts under Project conditions exceed thresholds by at least 2 dB; implementation of this alternative would therefore still result in cumulative noise impacts along the seven segments identified in Table 3.3-5 in Section 3.3, *Noise*. The net daily vehicle trips associated with this alternative would contribute to traffic noise levels on surrounding roadway segments as is the case with the Project, however, the contribution would be less under this alternative than with Project implementation. As with the Project, this alternative would not have a cumulatively considerable contribution to a cumulative traffic noise impact; the impact would be less than significant. (LTS)

Hazards and Hazardous Materials

Routine Hazardous Materials Use. As with the Project, the Base Level Maximum Office Alternative would be required to comply with mandatory hazardous materials regulations and stormwater pollution prevention plan (SWPPP) requirements. Operation of the Base Level Maximum Office Alternative would involve the use of household and commercial hazardous materials, such as cleaning agents, and paints. However, these materials would not be used, stored, or transported in large enough quantities to cause a substantial impact, either during construction or operation of the Base Level Maximum Office Alternatives. Furthermore, the use, storage, and transportation of hazardous materials are subject to applicable federal, state, and local regulations, the intent of which is to minimize the risk of upset. During construction activities, the Base Level Maximum Office Alternative would also be subject to Mitigation Measure HAZ-1.1 to minimize hazards through the routine transport and disposal of hazardous materials. Impact would be less than significant with mitigation, as with the Project. (LTS/M)

Hazardous Materials Release. Similar to the Project, the Base Level Maximum Office Alternative would require excavation and ground disturbance. Potential for soil and groundwater contamination exists at both the Derry Lane and 1300 El Camino Real Sites. At the Derry Lane Site, it has been confirmed that there is impacted soil and groundwater contaminated by tetrachloroethylene (PCE), trichloroethylene (TCE), dichloroethylene (DCE), and vinyl chloride from long-term commercial operations of Wo Sing Cleaners. At the 1300 El Camino Real Site, impacted soil may exist due to historic auto detailing and painting operations, from a pad-mounted transformer formerly onsite, and from the presence of undocumented fill found onsite.

Onsite soil disturbance has the potential to result in impacts due to hazardous materials releases in a variety of ways: soil disturbance could generate dust containing residual soil contaminants, which could pose an inhalation hazard to workers if contaminants adhere to the dust; improperly stockpiled soils could introduce contaminants into stormwater; and excavation and removal of contaminated soils, particularly if soils are used elsewhere onsite or transported for offsite disposal or reuse, could spread contaminants. Disturbance of groundwater at locations that may have been previously contaminated by prior uses could further extend contamination into the environment and expose construction workers, the public, or the environment to hazardous conditions. Furthermore, the general soil movement required for utility installations, utility trenches also have the potential to create a horizontal conduit for chemical contaminants contained in soil vapors or shallow groundwater to migrate along permeable soils that would be placed as trench backfill.

All of these activities proposed with the Base Level Maximum Office Alternative, similar to the Project, have the potential to result in a release of hazardous materials that could pose a human or environmental risk. However, implementation of Mitigation Measures HAZ-2.1 through HAZ-2.3 would reduce the potentially significant soil and groundwater contamination impacts at the Base Level Maximum Office Alternative to less than significant. (LTS/M)

Cumulative Impacts. All cumulative impacts of the Base Level Maximum Office Alternative would be less than cumulatively considerable with implementation of the mitigation measures noted above. Development of the Base Level Maximum Office Alternative and other cumulative development could expose people or the environment to residual contaminants in soil and/or groundwater if measures are not implemented to control unintentional or inadvertent releases. Development of the Base Level Maximum Office Alternative and other cumulative development could also expose people to asbestos, lead, polychlorinated biphenyls (PCBs), or other hazardous materials in existing buildings that may be demolished, renovated, or rehabilitated if measures are not implemented to control unintentional or inadvertent releases. However, implementation of the mitigation measures noted above, and compliance with current regulatory standards, would render the cumulative impacts less than significant, similar to the Project. (LTS)

Base Level Maximum Residential Alternative

Transportation

The Base Level Maximum Residential Alternative would likely result in the same transportation impacts as the Project. The Project is estimated to generate 3,740 net daily trips including 384 trips per AM Peak Hour and 401 per PM Peak Hour. The Maximum Residential Project Alternative would generate 644 fewer trips per day, including 136 fewer trips per AM Peak Hour, and 130 fewer trips during the PM Peak Hour (Table 5-3). The trip differential for the Base Level Maximum Residential Alternative is not enough to result in changes to intersection, roadway, pedestrian, bicycle, or transit impacts when compared to the Project. With the same impacts as the Project, the same mitigation measures detailed in Section 3.1, *Transportation*, would be required. Similar to the Project, impacts to intersections and roadways would be significant and unavoidable. (SU)

Table 5-3. Trip Generation Summary – Base Level Maximum Residential Alternative

Land Use	Units	Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Existing Conditions											
Existing Trips to be removed			-775		-6	-3	-3		-53	-28	-25
Maximum Office Alternative											
Apartment	206 du	6.66	1,372	0.51	105	21	84	0.64	131	85	46
Office	87 ksf	13.57	1,181	1.97	171	151	20	2.02	176	30	146
Shopping Center	15 ksf	131.92	1,979	3.27	49	30	19	11.20	168	81	87
Subtotal			4,532		325	202	123		475	196	279
<i>Trip Reduction¹</i>			-308		-62	-33	-29		-121	-56	-65
<i>Pass-by (retail only)²</i>			-353		-9	-6	-3		-30	-16	-14
Project Trips			3,871		254	163	91		324	124	200
Net Trip Generation			3,096		248	160	88		271	96	175
Project (for comparison)			3,740		384	283	101		401	126	275
Net Difference (Project – Project Alternative)			-644		-136	-123	-13		-130	-30	-100

ksf = thousand square feet

du = dwelling unit

Notes:

Based on methodologies presented in *Trip Generation Handbook, 3rd Edition*, ITE, 2014. Trip Reduction worksheets are enclosed for reference.

A 25% pass-by reduction for retail uses, taken after all of trip reduction rates were applied.

Air Quality

Exposure of Sensitive Receptors to Localized Particulate Matter Emissions during Construction.

Diesel-fueled engines, which generate PM_{2.5}, would be used during construction of the Base Level Maximum Residential Alternative, similar to the Project. Construction of the Base Level Maximum Residential Alternative would also result in fugitive (dust) emissions of PM_{2.5} through site disturbance and truck travel. Multiple sensitive receptors are located within 1,500 feet of the Project site, as noted above for the Base Level Maximum Office Alternative. Similar to the Project, construction of the Base Level Maximum Residential Alternative would likely result in significant increases in PM_{2.5} concentrations without mitigation, but implementation of Mitigation Measures AQ-1.1, AQ-1.2, and AQ-1.3 would reduce these impacts to a less-than-significant level. Exposure to PM_{2.5} concentrations with implementation of the Base Level Maximum Residential Alternative would be less than significant with mitigation. (LTS/M)

Cumulative Impacts. Implementation of the Base Level Maximum Residential Alternative in combination with El Camino Real vehicle traffic and Caltrain emissions, similar to the Project, would result in a less-than-significant cumulative impact for the non-cancer hazard index, cancer risk, and PM_{2.5} concentrations after implementation of mitigation measures. Since the Base Level Maximum Residential Alternative would result in a reduction of building area compared to the Project, these impacts would be less than under the Project. Similar to the Project, construction of the Base Level

Maximum Residential Alternative would likely result in significant increases in cancer risk and PM2.5 concentrations without mitigation, but implementation of Mitigation Measures AQ-1.1, AQ-1.2, and AQ-1.3 would reduce these cumulative impacts to a less-than-significant level. (LTS/M)

Noise

Traffic Noise Impacts. The Base Level Maximum Residential Alternative would result in a reduction in the development at the site. As such, the total number of vehicle trips generated under this alternative would be reduced compared to the Project. The Base Level Maximum Residential Alternative would generate 3,096 net daily vehicle trips, which is 644 fewer daily trips than would be generated with the Project's 3,740 net daily trips. There would be no impacts related to traffic noise with implementation of the Project. As the Residential Office Alternative would reduce the total amount of development and the associated vehicle trips as compared to the Project, impacts related to traffic noise would also be less than significant. (LTS)

Cumulative Impacts. As discussed in Section 3.3, *Noise*, a project would generally result in a significant cumulative traffic noise impact if cumulative plus project noise levels at existing sensitive receivers were greater than the applicable thresholds (60 dBA L_{DN} for single-family residential land uses). A project would have a cumulatively considerable contribution to the overall increase in traffic noise levels if it would increase cumulative traffic noise levels by greater than 1 dB under cumulative plus project conditions.

Modeling results for Cumulative plus Project traffic noise levels indicated that cumulative traffic noise would be in excess 60 dBA L_{DN} at a distance of 50 feet for seven of the 14 analyzed roadway segments in the vicinity of the Project site. The Base Level Maximum Residential Alternative would result in 3,096 net daily trips, or 644 trips fewer than the number generated by the Project (3,740 net daily trips); this is an approximately 17-percent reduction in traffic; however, it would only reduce traffic noise levels by less than 1 dB, and all segments with cumulative noise impacts under Project conditions exceed thresholds by at least 2 dB. Implementation of this alternative would therefore still result in cumulative noise impacts along the seven segments identified Table 3.3-5 in Section 3.3, *Noise*. The net daily vehicle trips associated with this alternative would contribute to traffic noise levels on surrounding roadway segments as is the case with the Project; however, the contribution would be less under this alternative than with Project implementation. As with the Project, this alternative would not have a cumulatively considerable contribution to a cumulative traffic noise impact; the impact would be less than significant. (LTS)

Hazards and Hazardous Materials

Routine Hazardous Materials Use. As with the Project, the Base Level Maximum Residential Alternative would be required to comply with mandatory hazardous materials regulations and SWPPP requirements. Operation of the Base Level Maximum Residential Alternative would involve the use of household and commercial hazardous materials, such as cleaning agents, and paints. However, these materials would not be used, stored, or transported in large enough quantities to cause a substantial impact, either during construction or operation of the Base Level Maximum Residential Alternative. Furthermore, the use, storage, and transportation of hazardous materials are subject to applicable federal, state, and local regulations, the intent of which is to minimize the risk of upset of hazardous materials. During construction activities, the Base Level Maximum Residential Alternative would also be subject to Mitigation Measure HAZ-1.1 minimize hazards through the routine transport and disposal of hazardous materials. Impact would be less than significant with mitigation, as with the Project. (LTS/M)

Hazardous Materials Release. Similar to the Project, the Base Level Maximum Residential Alternative would require excavation and ground disturbance. Potential for soil and groundwater contamination exists at both the Derry Lane and 1300 El Camino Real Sites. At the Derry Lane Site, contamination was confirmed in the form of soil and groundwater impacted with PCE, TCE, DCE, and vinyl chloride from long-term commercial operations of Wo Sing Cleaners. At the 1300 El Camino Real Site, impacted soil may exist due to historic auto detailing and painting practices on the site, from a pad-mounted transformer formerly onsite, and from the presence of undocumented fill found onsite.

Onsite soil disturbance has the potential to result in impacts due to hazardous materials releases in a variety of ways: soil disturbance could generate dust containing residual soil contaminants. These contaminants could pose an inhalation hazard to workers if they adhere to the dust; improperly stockpiled soils could introduce contaminants into stormwater; and excavation and removal of contaminated soils, particularly if soils are used elsewhere onsite or transported for offsite disposal or reuse, could spread contaminants. Disturbance of groundwater at locations that may have been contaminated by previous uses could further extend contamination into the environment and expose construction workers, the public, or the environment to hazardous conditions. Furthermore, the general soil movement required for utility installations, utility trenches also have the potential to create a horizontal conduit for chemical contaminants contained in soil vapors or for the migration of shallow groundwater along permeable soils that would be placed as trench backfill.

All of these activities proposed with the Base Level Maximum Residential Alternative, similar to the Project, have the potential to result in a release of hazardous materials that could pose a human or environmental risk. However, implementation of Mitigation Measures HAZ-2.1 through HAZ-2.3 would render the potentially significant soil and groundwater contamination impacts of the Base Level Maximum Residential Alternative less than significant. (LTS/M)

Cumulative Impacts. All cumulative impacts of the Base Level Maximum Residential Alternative would be less than cumulatively considerable with implementation of the mitigation measures noted above. Development of the Base Level Maximum Residential Alternative and other cumulative development could expose people or the environment to residual contaminants in soil and/or groundwater if measures are not implemented to control unintentional or inadvertent releases. Development of the Base Level Maximum Residential Alternative and other cumulative development could also expose people to asbestos, lead, PCBs, or other hazardous materials in existing buildings that may be demolished, renovated, or rehabilitated if measures are not implemented to control unintentional or inadvertent releases. However, implementation of the mitigation measures noted above and compliance with current regulatory standards would reduce the cumulative impacts to a level that is less than significant, similar to the Project. (LTS)

5.5 Comparison of Impacts

Table 5-4 presents a summary comparison of the potential environmental issues associated with various Project alternatives, including their significance (if any) after mitigation, where indicated.

Table 5-4. Comparison of Impacts among Project Alternatives

Environmental Issue	Project	No-Project Alternative	Maximum Office	Maximum Residential
Transportation				
Impacts on Intersections	SU	NI	SU	SU
Impacts on Roadway Segments	SU	NI	SU	SU
Impacts on Routes of Regional Significance	SU	NI	SU	SU
Impacts on Pedestrian and Bicycle	LTS	NI	LTS	LTS
Impacts on Transit Facilities	LTS	NI	LTS	LTS
Cumulative Impacts	SU	NI	SU	SU
Air Quality				
Exposure of Sensitive Receptors to Localized Particulate Matter Emissions during Construction	LTS/M	NI	LTS/M	LTS/M
Cumulative Impacts	LTS/M	NI	LTS/M	LTS/M
Noise				
Traffic Noise Impacts	LTS	NI	LTS	LTS
Cumulative Impacts	LTS	NI	LTS	LTS
Hazards and Hazardous Materials				
Routine Hazardous Materials Use	LTS/M	LTS/M	LTS/M	LTS/M
Accidental Release of Hazardous Materials	LTS/M	LTS/M	LTS/M	LTS/M
Cumulative Impacts	LTS	LTS	LTS	LTS
NI = No impact LTS = Less than significant LTS/M = Less than significant with mitigation SU = Significant and unavoidable				

5.6 Environmentally Superior Alternative

Sections 21002 and 21081 of the CEQA Guidelines require lead agencies to adopt feasible mitigation measures or feasible environmentally superior alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. CEQA also requires that an environmentally superior alternative be identified among the alternatives analyzed. In general, the environmentally superior alternative is the project that avoids or substantially lessens some or all of the significant and unavoidable impacts of the project (CEQA Guidelines Section 15126.6).

On the basis of comparing the extent to which the alternatives reduce or avoid the significant impacts of the Project, the No-Project Alternative would be the environmentally superior alternative. Because no development would occur at the Project site, there would be no construction or operational impacts. However, the CEQA Guidelines state that the No-Project Alternative cannot be selected as the environmentally superior alternative.

As previously discussed, the Reduced-Intensity Alternatives (the Maximum Office and Maximum Residential) would result in reduction of building area of approximately 27 percent compared to the Project. However, as discussed above, the Base Level Maximum Residential Alternative would result in a greater decrease in vehicle trips over the Base Level Maximum Office Alternative. Since impacts related to air quality, noise, and transportation are all closely related to vehicle trips, it is anticipated that the Base Level Maximum Residential Alternative would result in less severe environmental impacts when compared to the Project and the other alternatives. Impacts related to hazardous materials would be similar for both the Maximum Office and Base Level Maximum Residential Alternatives. However, due to the reduction in vehicle trips, the Base Level Maximum Residential Alternative is considered the environmentally superior alternative.