Chapter 4
Other CEQA Issues

This section has been included to update the proposed project's area of known controversy and issues to be resolved based on the board's motion to grant the appeal of the planning commission's certification of the final EIR and require further environmental review of the proposed project's potential impacts.

4.A Areas of Known Controversy and Issues to Be Resolved

The planning department prepared an initial study checklist and published a NOP for an EIR on October 2, 2019, thereby announcing its intent to prepare and distribute a focused EIR (the NOP and initial study checklist are presented as Appendix A to this EIR). Publication of the NOP and initial study checklist initiated a 30-day public review and comment period that began on October 3, 2019 and ended on November 1, 2019. Individuals and agencies that received these notices included owners of properties within 300 feet of the project site and potentially interested parties, and responsible agencies, including regional and state agencies. Five written communications were received during the public review period. Four of the five comments requested additional information, such as the project sponsor's email address and requests for a hard copy of the initial study document. The planning department provided such requested information to the respective commenters. The fifth comment received noted a concern with vehicular circulation to and from the project site and inquired if the proposed project would implement limitations on the use of vehicles during the morning and afternoon rush hours. Information regarding project site circulation is provided in Section E.5, Transportation and Circulation, of the initial study (Appendix A). As disclosed in the initial study, impacts related to transportation and circulation would be less than significant. Potential areas of controversy for the proposed project include the potential effects of the proposed project related to air quality, wind, shadow, and transportation and circulation.

The previously circulated draft EIR was certified by the San Francisco Planning Commission on July 29, 2021. On October 26,2021, the board of supervisors granted an appeal of the planning commission's certification of the final EIR and on December 14, 2021, the board of supervisors adopted findings in support of its decision to grant the appeal. The board of supervisors remanded the final EIR to the planning department to undertake further environmental review of the project's potential impacts to historic resources, potential geotechnical impacts resulting from construction of the project, potential physical impacts resulting from gentrification and displacement of local residents, and potentially feasible mitigation measures and alternatives to address significant impacts in those areas. Accordingly, the planning department has conducted further analysis to address the board of supervisors' findings and is presenting the results in this recirculated draft EIR.

Chapter 5
Alternatives

5.A Introduction

This chapter presents the alternatives analysis, as required by CEQA, for the proposed project. The chapter includes a discussion of the CEQA requirements for an alternatives analysis and the methodology used for the selection of alternatives, with the intent of developing potentially feasible alternatives that avoid or substantially lessen the significant impacts identified for the proposed project while still meeting most of the basic project objectives. This chapter identifies a reasonable range of alternatives that meet the above criteria.

The alternatives are evaluated for their comparative merits with respect to minimizing adverse environmental effects. After identifying the alternatives, the chapter evaluates the alternatives' impacts compared to existing environmental conditions and compared to the impacts of the proposed project.

The previously circulated draft EIR analyzed three alternatives: the No Project Alternative; Reduced Density Alternative; and No Residential Parking, Tower Only Alternative. There have been no changes to the three alternatives presented in the previously circulated draft EIR. The following analysis has been updated to reflect the potential impacts of the alternatives as they relate to population and housing, cultural resources, and geology and soils.

5.B Alternatives Analysis

This analysis evaluates the impacts of each of the selected alternatives and identifies whether those impacts would be less than, similar to, or greater than the impacts of the proposed project.

5.B.1 Alternative A: No Project Alternative

DESCRIPTION

Under the No Project Alternative, the project site would remain substantially in its existing physical condition and the proposed new residential uses would not be developed. The existing onsite parking lot would remain unaltered.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project Alternative would maintain the existing physical environment of the project site and no residential uses would be constructed. Therefore, the alternative would not meet any of the project sponsor's objectives.

IMPACTS

POPULATION AND HOUSING

Under the No Project Alternative, the existing onsite parking lot would remain unaltered and the new residential and commercial retail uses would not be developed. The No Project Alternative would not generate additional residents or employees at the project site, and therefore would have no impact on population and housing.

Commented [JK1]: Planning - This will be updated pending any additional information in the displacement analysis.

CULTURAL RESOURCES

Under the No Project Alternative, the existing onsite parking lot would remain unaltered and the new residential and commercial retail uses would not be developed. The No Project Alternative would not involve any construction or demolition activities, and therefore the No Project Alternative would have no impact on the adjacent historic districts or to the historic resources adjacent to the project site.

GEOLOGY AND SOILS

Under the No Project Alternative, the project site would remain as an existing surface parking lot and the new residential and commercial retail uses would not be developed. The No Project Alternative would not involve any demolition, construction, or excavation activities. Therefore, the No Project Alternative would have no impact related to geology and soils.

TOPICS ANALYZED IN THE INITIAL STUDY

OTHER INITIAL STUDY TOPICS

The initial study concluded that the proposed project would have no impacts or less than significant impacts for the following environmental topics: Land Use and Land Use Planning, unplanned population growth ~~Population and Housing~~, Odors, Greenhouse Gas Emissions, Recreation, Utilities and Service Systems, Public Services, Biological Resources, ~~Geology and Soils,~~ Hydrology and Water Quality, Hazards/Hazardous Materials, Mineral Resources, Energy Resources, Agriculture and Forestry Resources, and Wildfire. Under the No Project Alternative, the proposed project would not be constructed or operated, and the project site would continue to operate as a public surface parking lot. Therefore, the No Project Alternative would result in no impacts related to these other initial study topics.

Commented [JK2]: Planning – We have included this section from the previously circulated draft EIR for each alternative to show updates that unplanned population growth and geology and soils are now discussed further in the recirculated EIR.

5.B.2 Alternative B: Reduced Density Alternative

DESCRIPTION

The purpose of the Reduced Density Alternative is to consider a project alternative that would lessen the significant impacts on Mint Plaza that would occur from construction of the proposed project. The Reduced Density Alternative would redevelop the project site with a new mixed-use residential project, similar to the proposed project, but would construct a shorter and less dense building than under the proposed project.

The Reduced Density Alternative would include a maximum FAR of 338,629 gsf and a building height of approximately 160 feet (with an additional 10 feet for rooftop mechanical equipment). The proposed density and building height would be consistent with the planning code.

Under this alternative, the site would be redeveloped to provide 346 units comprised of approximately 42 studios, 204 one-bedroom units, 64 two-bedroom units, and 36 three-bedroom units, compared to the 495 units that would be provided by the proposed project. On floors two through eight, 34 residential units would be provided on each floor. On the ninth floor, the building footprint would be reduced allowing for the common terraces and 12 residential units. Twelve residential units would also be provided on floors 9 through 17.

Similar to the proposed project, primary access to the units would be via a 1,951 square foot residential lobby located along Jessie Street with secondary access along Stevenson Street and through the below-grade parking garage. Two retail spaces totaling 6,357 square feet would be provided along Jessie Street flanking the residential lobby, which is slightly more than the retail space provided by the proposed project (4,000 square feet). An 8,242 square foot residential amenity space would be provided along Stevenson Street.

Unlike the proposed project, the Reduced Density Alternative would only provide two levels of below grade parking (as opposed to the three levels with the proposed project). As a result, the Reduced Density Alternative only requires 37,600 cubic yards of excavation compared to 55,850 cubic yards for the proposed project.

The Reduced Density Alternative would include 150 residential vehicular parking spaces (a 0.43 parking ratio) below grade, which is 28 fewer total residential vehicular parking spaces than the proposed project, 2 service vehicle parking spaces, and 2 car-share spaces. One off-street freight loading space would also be provided at grade like the proposed project. All access to off-street parking and freight loading would be provided via a single curb-cut along Stevenson Street, similar to the proposed project. The Reduced Density Alternative would also provide 192 class 1 bicycle parking spaces in a bicycle storage room on the ground floor accessed via the public lobby. Twenty-three class 2 bicycle parking spaces would also be provided along Stevenson and Jessie streets. A bicycle workshop area would be provided in the below grade parking garage, similar to the proposed project.

Open space would be provided in a series of common terraces at the podium and tower levels. A 7,141 square foot common open space would be provided on the second floor fronting Stevenson Street and two common open space terraces totaling 9,282 square feet would be provided on the ninth floor.

Construction of the Reduced Density Alternative is expected to follow a 29-month construction schedule, which would be 7 months shorter than the proposed project construction schedule. The same discretionary project approvals identified for the proposed project would be required for this alternative.

Figure 24 provides a visual rendering and Figure 25 provides an elevation plan of the Reduced Density Alternative.

Commented [JK3]: Figure number will be updated in printcheck. This may change with population and housing section.

ABILITY TO MEET PROJECT OBJECTIVES

The Reduced Density Alternative could feasibly attain most of the project sponsor objectives. However, this alternative would provide 149 fewer residential units than the proposed project (346 units with the Reduced Density Alternative compared to 495 units with the proposed project). As a result, the Reduced Density Alternative would not maximize the opportunity to alleviate the current housing shortage and to contribute to the City's Regional Housing Needs Allocation to the same extent as the proposed project (Objective 2). In addition, by providing fewer residential units, the Reduced Density Alternative would also provide fewer affordable units, thereby not promoting the construction of affordable units to the same extent as the proposed project (Objective 3). Finally, the reduced density could make redevelopment of the site economically infeasible (Objective 8).

Commented [VS(x4]: Because this alternative would not utilize the state density bonus, it would not be required to provide on-site affordable units. The project sponsor would have the option of providing on-site units (but fewer than with the proposed project) or pay the in lieu Affordable Housing Fee, which would result in no on-site affordable units.

Commented [JK5]: Planning: This will be updated once the displacement study is available since units that would be removed would be the affordable units.

IMPACTS

POPULATION AND HOUSING

The Reduced Density Alternative would construct 346 units, which is approximately 149 fewer units than the proposed project. Based on the average household size in the City and County of San Francisco of 2.35 people per household, the addition of 346 residential units, would increase the citywide population by approximately 813 residents compared to the proposed project, which would generate approximately 1,163 residents. As with the proposed project, the Reduced Density Alternative would still increase the population of the City with the construction of new residential units. However, impacts on population and housing would be less than the proposed projects as this alternative would construct fewer residential units.

The Reduced Density Alternative would also construct an additional 2,357 gsf of commercial retail space for a total of 6,357 gsf. The proposed project would construct approximately 4,000 gsf of commercial retail space, which is expected to employ approximately 11 staff. The approximately 6,357 gsf of commercial retail space is expected to employ approximately 18 staff. While the Reduced Density Alternative would increase the number of employees at the project site, this amount of retail would be similar to the proposed project and not anticipated to attract new employees to San Francisco. Therefore, it can be anticipated that most of the employees would live in San Francisco (or nearby communities), and that the Reduced Density Alternative would not generate a greater demand for new housing for the potential commercial employees compared to the proposed project.

CULTURAL RESOURCES

Under the Reduced Density Alternative, the project would be approximately 160 feet in height (with an additional 10 feet for rooftop mechanical equipment), which is consistent with the planning code. The project would still be adjacent to or across the street from contributors to four different historic

U.S. Census Bureau, San Francisco County, California, Families and Living Arrangements, Persons per households, 2013-2017. Available online at: https://www.census.gov/quickfacts/sanfranciscocountycalifornia. Accessed June 12, 2019.

495 residential units x 2.35 people per household = 1,163 new residents.

San Francisco Planning Department, Transportation Impact Analysis Guidelines for Environmental Review (Guidelines), February 2019. The estimated number of employees is based on the Guidelines which assumes an average of 1 employee per 350 square feet of retail (4,000 square feet of retail ÷ 350 = 11 employees).

San Francisco Planning Department, Transportation Impact Analysis Guidelines for Environmental Review (Guidelines), February 2019. The estimated number of employees is based on the Guidelines which assumes an average of 1 employee per 350 square feet of retail (6,357 square feet of retail ÷ 350 = 18 employees).

districts: Market Street Theater and Loft Historic District, the Sixth Street Lodginghouse Historic District, the San Francisco article 11 Mint-Mission Conservation District, and the PG&E City Beautiful Substations Discontiguous Thematic Historic District. As with the proposed project, this alternative would provide a contemporary design that is generally compatible with the surrounding historic districts and their contributors. Additionally, as with the proposed project, the most substantial difference in character between the adjacent and nearby historic district contributors and this alternative is the building height. However, the Reduced Density Alternative would be 17 stories, consistent with the planning code, compared to the proposed project which would be 27 stories. As such, the overall building height of the Reduced Density Alternative would be less visually dominant than the proposed project.

The Reduced Density Alternative would require the same construction activities and use of the same construction equipment as the proposed project. Therefore, temporary vibration levels generated at the project site are expected to be similar to the proposed project and would not result in vibration levels that could cause physical damage to adjacent historic resources. As with the proposed project, the Reduced Density Alternative would be required to implement Improvement Measure I-CR-2 to further reduce vibration. Therefore, construction of the Reduced Density Alternative would result in the same level of impact to historic resources as the proposed project.

GEOLOGY AND SOILS

Under the Reduced Density Alternative, the project would be approximately 160 feet in height (with an additional 10 feet for rooftop mechanical equipment), which is consistent with the planning code. Unlike the proposed project, the Reduced Density Alternative would only provide two levels of below grade parking (as opposed to the three levels with the proposed project). As a result, the Reduced Density Alternative only requires 37,600 cubic yards of excavation compared to 55,850 cubic yards for the proposed project. The potential impacts related to the subsurface conditions and potential seismic hazards, including fault rupture, ground shaking, liquefaction, lateral spreading, and seismic densification would remain the same as the proposed project. As with the proposed project, the Reduced Density Alternative would be required to prepare a design-level geotechnical report and comply with the requirements of the San Francisco Building Code, California Building Code, and AB-082. The design-level geotechnical report would include recommendations for the foundation and for other geotechnical issues relevant to the Reduced Density Alternative. The Reduced Density Alternative would be approximately 160 feet in height, and therefore would not be subject to the requirements of AB-111 as the building height would be less than 240 feet. Instead, the Reduced Density Alternative would be subject to the requirements of AB-083, which presents requirements and guidelines for seismic structural design and submittal documents for building permits for new tall buildings that are up to 160 feet in height ~~or taller~~ that use non-prescriptive seismic design procedures. AB-083 uses a three-step procedure to demonstrate that a building design is capable of providing code-equivalent seismic performance. The three steps include structural design review, submittal requirements, and seismic design requirements to demonstrate acceptable seismic performance for moderate earthquakes. As the Reduced Density Alternative would be subject to the

San Francisco Department of Building Inspection, Administrative Bulletin AB-083, Requirements and Guidelines for the Seismic Design of New Tall Buildings using Non-Prescriptive Seismic-Design Procedures, March 25, 2008 (Updated 01/01/2020 for code references). Available at https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_building/0-0-0-95298.

AB-082 provides the overall requirements for structural and geotechnical review procedures and guidance, but if a project request an exception to provisions in the building code, those projects must follow the requirements in AB-083, for buildings taller than 160 feet tall, or AB-111, for buildings taller than 240 feet tall.

same regulatory requirements as the proposed project, the Reduced Density Alternative would result in the same level of impact to geology and soils as the proposed project.

TOPICS ANALYZED IN THE INITIAL STUDY

OTHER INITIAL STUDY TOPICS

The initial study concluded that the proposed project would have no impacts or less than significant impacts for the following environmental topics: Land Use and Land Use Planning, unplanned population growth ~~Population and Housing~~, Odors, Greenhouse Gas Emissions, Recreation, Utilities and Service Systems, Public Services, Biological Resources, ~~Geology and Soils~~, Hydrology and Water Quality, Hazards/Hazardous Materials, Mineral Resources, Energy Resources, Agriculture and Forestry Resources, and Wildfire. Impacts of the Reduced Density Alternative for these topics would be similar in character to, but less than those identified for the proposed project due to the shorter duration of construction activities and the reduced intensity of construction activities and land uses. The Reduced Density Alternative would not result in any new potentially significant impacts for these environmental topics evaluated in the initial study (Appendix A). As such, impacts related to these other initial study topics would be similar to those of the proposed project and either result in a less than significant impact or no impact.

5.B.3 Alternative C: No Residential Parking, Tower Only Alternative

DESCRIPTION

The purpose of the No Residential Parking, Tower Only Alternative is to propose a project that would lessen the significant air quality, noise, archeological and tribal cultural resources impacts of the proposed project associated with the grading and excavation needed to build the three below-grade levels for parking and loading spaces. The No Residential Parking, Tower Only Alternative would redevelop the project site with a new mixed-use residential project, similar to the proposed project, but would include only one basement level (as opposed to the three basement levels included in the proposed project). The No Residential Parking, Tower Only Alternative would result in a taller building, but with 28 fewer units than the proposed project by slightly changing the design to eliminate the podium height massing along the four corners and relocate that square footage to the top of the building creating a streamlined single tower.

Commented [VS(x6]: This alternative would utilize the state density bonus program, so it would include fewer on-site affordable units than the proposed project.

The No Residential Parking, Tower Only Alternative would include a single tower with one basement level with a maximum FAR of 479,957 square feet. The tower would be approximately 284-feet-tall (with additional 10 feet for rooftop mechanical equipment).

This alternative would include 467 units comprised of approximately 349 one-bedroom units, 60 two-bedroom units, and 58 three-bedroom units. Residential uses would begin at the second floor, which includes 17 units and a 11,078-square-foot common open space podium balcony. The 3rd through 28th floors would include 18 residential units per floor with the units on the 28th floor having 576 square feet (total) of private balconies.

Primary access to the residential units would be from the residential lobby located along Jessie Street with secondary access along Stevenson Street. The ground floor would include two retail spaces

along Jessie Street totaling approximately 3,651 square feet and on each side of the 1,453 square foot lobby. A 747 square foot common open space would be provided along Jessie Street and a 9,500 square foot solarium for residents would be provided along Stevenson Street.

The No Residential Parking, Tower Only Alternative would require 45,110 cubic yards less excavation (10,740 cubic yards total) than the proposed project (55,850 cubic yards) for below-grade foundation and structural work because it would only provide one basement level.

The single basement level would be for off-street loading and service vehicle parking, accessible parking, and bicycle parking. No car-share parking would be provided for this alternative pursuant section 166 of the planning code. This alternative would provide 193 class 1 bicycle parking spaces in a bicycle storage room located in the basement and accessed via the ground floor lobby. This alternative would also provide 25 class 2 bicycle parking spaces along Jessie and Stevenson streets.

Open space would include a ground floor solarium, a second story podium terrace, and private balconies at the rooftop level.

Construction of the No Residential Parking, Tower Only Alternative is expected to follow a 34-month construction schedule, which is two months shorter than the proposed project's construction schedule. The same discretionary project approvals identified for the proposed project would be required for this alternative.

Figure 27 provides a visual rendering and Figure 28 provides an elevation plan of the No Residential Parking, Tower Only Alternative.

Commented [JK7]: Figure number will be updated in printcheck. This may change with population and housing section.

ABILITY TO MEET PROJECT OBJECTIVES

The No Residential Parking, Tower Alternative could feasibly attain most of the project sponsor objectives, including providing much-needed housing. However, by not providing any residential parking, the alternative would fail to meet the objective of providing adequate off-street vehicle parking for the residential use and to meet investment capital parking requirements (Objective 6). The lack of residential parking could also create financing challenges as it would render a standard construction loan unattainable and potentially make development of the site economically infeasible (Objective 8).

IMPACTS

POPULATION AND HOUSING

Under the No Residential Parking, Tower Only Alternative, the project would construct 467 units, which is approximately 28 fewer units than the proposed project. Based on the average household size in the City and County of San Francisco of 2.35 people per household, the addition of 467 residential units, would increase the citywide population by approximately 1,098 residents compared to the proposed project, which would generate approximately 1,163 residents. As with the proposed project, the No Residential Parking, Tower Only Alternative would still increase the population of the

Commented [JK8]: Planning: This will be updated once the displacement study is available since units that would be removed would be the affordable units.

Commented [VS(x9R9]: This is not correct. There would need to be on-site affordable units to qualify for the state density bonus.

U.S. Census Bureau, San Francisco County, California, Families and Living Arrangements, Persons per households, 2013-2017. Available online at: https://www.census.gov/quickfacts/sanfranciscocountycalifornia. Accessed June 12, 2019.
495 residential units x 2.35 people per household = 1,163 new residents.

City with the construction of new residential units. However, impacts on population and housing would be less than the proposed projects as this alternative would construct fewer residential units.

The No Residential Parking, Tower Only Alternative would construct approximately 3,651 gsf of commercial retail space, which is approximately 349 gsf less than the proposed project. The 3,651 gsf of commercial retail space is expected to employ approximately 10 staff. The number of employees generated by the No Residential Parking, Tower Only Alternative would be similar to the proposed project, which is expected to employ approximately 11 staff. As such, the No Residential Parking, Tower Only Alternative is not anticipated to attract new employees to San Francisco. Therefore, it can be anticipated that most of the employees would live in San Francisco (or nearby communities), and that the No Residential Parking, Tower Only Alternative would not generate a greater demand for new housing for the potential commercial employees compared to the proposed project.

CULTURAL RESOURCES

Under the No Residential Parking, Tower Only Alternative, the project would be approximately 284-feet-tall (with additional 10 feet for rooftop mechanical equipment). The No Residential Parking, Tower Only Alternative would be approximately 10 feet taller than the proposed project. The project would still be adjacent to or across the street from contributors to four different historic districts: Market Street Theater and Loft Historic District, the Sixth Street Lodginghouse Historic District, the San Francisco article 11 Mint-Mission Conservation District, and the PG&E City Beautiful Substations Discontiguous Thematic Historic District. As with the proposed project, this alternative would provide a contemporary design that is generally compatible with the surrounding historic districts and their contributors. Additionally, as with the proposed project, the most substantial difference in character between the adjacent and nearby historic district contributors and this alternative would be the building height. Compared to the proposed project, the No Residential Parking, Tower Only Alternative would slightly change the design to eliminate the podium height massing along the four corners and relocate that square footage to the top of the building creating a streamlined single tower. Therefore, the additional building height and slight change in design would result in a more visually dominant tower compared to the proposed project.

The No Residential Parking, Tower Only Alternative would require the same construction activities and use of the same construction equipment as the proposed project. Therefore, temporary vibration levels generated at the project site are expected to be similar to the proposed project and would not result in vibration levels that could cause physical damage to adjacent historic resources. As with the proposed project, the No Residential Parking, Tower Only Alternative would be required to implement Improvement Measure I-CR-2 to further reduce vibration. Therefore, construction of the No Residential Parking, Tower Only Alternative would result in the same level of impact to historic resources as the proposed project.

GEOLOGY AND SOILS

Under the No Residential Parking, Tower Only Alternative, the project would be approximately 284-feet-tall (with additional 10 feet for rooftop mechanical equipment). The No Residential Parking, Tower Only Alternative would require 45,110 cubic yards less excavation (10,740 cubic yards total) than the proposed project (55,850 cubic yards) for below-grade foundation and structural work because it would only provide one basement level.

The potential impacts related to the subsurface conditions and potential seismic hazards, including fault rupture, ground shaking, liquefaction, lateral spreading, and seismic densification would remain the same as the proposed project. As with the proposed project, the No Residential Parking, Tower Only Alternative would be greater than 240 feet and required to comply with the requirements of the San Francisco Building Code, California Building Code, AB-082, and AB-111. Additionally, the No Residential Parking, Tower Only Alternative would be required to prepare a design-level geotechnical report, including additional field investigation, laboratory testing program, and supplemental engineering analyses in accordance with AB-111. The design-level geotechnical report would be reviewed by geotechnical reviewer(s) who are part of the EDRT. The EDRT review would be conducted in accordance with the guidelines and requirements in AB-111. At the conclusion of the review, the geotechnical members of the EDRT shall provide a written statement if, in their professional opinion, the geotechnical site-investigation plan and the geotechnical reports (including the engineer of record's geotechnical basis of design document) meet the requirements of the San Francisco Building Code and AB-111. The additional geotechnical analysis required under AB-111 and independent professional peer review under AB-111 and AB-082 during the building permit review process would determine the foundation system. The building department would conduct its own review of the project's construction documents for conformance with the San Francisco Building Code and the geotechnical engineer's recommendations as deemed acceptable by the structural and geotechnical peer review process. As the No Residential Parking, Tower Only Alternative would be subject to the same regulatory requirements as the proposed project, the No Residential Parking, Tower Only Alternative would result in the same level of impact to geology and soils as the proposed project.

TOPICS ANALYZED IN THE INITIAL STUDY

OTHER INITIAL STUDY TOPICS

The initial study concluded that the proposed project would have no impacts or less than significant impacts for the following environmental topics: Land Use and Land Use Planning, unplanned population growth ~~Population and Housing~~, Odors, Greenhouse Gas Emissions, Recreation, Utilities and Service Systems, Public Services, Biological Resources, ~~Geology and Soils~~, Hydrology and Water Quality, Hazards/Hazardous Materials, Mineral Resources, Energy Resources, Agriculture and Forestry Resources, and Wildfire. The No Residential Parking, Tower Only Alternative would be similar in character to, but require less construction than identified for the proposed project due to the shorter duration of construction activities and less amount of excavation of the site as there would only be one basement level. The No Residential Parking, Tower Only Alternative would result in 28 fewer residential units on the project site, but the intensity of development under this alternative would be comparable to the proposed project. As such, the No Residential Parking, Tower Only Alternative would not result in any new potential significant impacts for these environmental topics evaluated in the initial study (Appendix A). Impacts related to these other initial study topics would be similar to those of the proposed project and either result in a less than significant impact or no impact.

5.B.4 Environmentally Superior Alternative

The CEQA Guidelines require the identification of an environmentally superior alternative (section 15126.6(e)), which is the alternative that best avoids or lessens any significant impacts of the proposed project, even if the alternative would impede to some degree attainment of the project

objectives. If it is determined that the "no project" alternative would be the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other project alternatives (section 15126.6(3)). Table 6.2-1, Comparison of Significant Impacts of the Proposed Project to Impacts of Alternatives after Mitigation, compares the significant impacts of the proposed project, No Project Alternative, Reduced Density Alternative, and No Residential Parking, Tower Only Alternative.

The No Project Alternative is considered the environmentally superior alternative because the significant impacts of the proposed project related to air quality, shadow, archeological resources, human remains, tribal cultural resources, and noise would not occur under the No Project Alternative. However, the No Project Alternative would not meet any of the project sponsor objectives.

Because CEQA requires selection of an environmentally superior alternative other than the No Project Alternative, the Reduced Density Alternative is identified as the environmentally superior alternative. The Reduced Density Alternative would require implementation of the same mitigation measures as the proposed project to reduce impacts related to archeological resources, human remains, tribal cultural resources, noise, and air quality. However, the severity and potential for impacts to those topic areas would be reduced compared with those of the proposed project because of the reduced amount of excavation and earth movement, shorter construction duration, and fewer residential units constructed. The Reduced Density Alternative would be 114 feet shorter than the proposed project and would not cast net new shadow on UN Plaza and would avoid the significant and unavoidable project-level and cumulative shadow impact on Mint Plaza. As discussed above, the Reduced Density Alternative could feasibly attain most of the project sponsor objectives.

Commented [JK10]: Planning and Stantec to discuss approach pending completion of the displacement study.

Table 5.B-1: Comparison of Significant Impacts of the Proposed Project to Impacts of Alternatives After Mitigation

Impact Statement	Proposed Project	Alternative A: No Project Alternative	Alternative B: Reduced Density Alternative	Alternative C: No Residential Parking, Tower Only Alternative
Population and Housing				
Impact PH-1: The proposed project would displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing.	TBD	TBD	TBD	TBD
Cultural Resources				
Impact CR-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines section 15064.5.	LS	NI	LS =/<	LS =/>
Impact CR-2: Demolition of the existing surface parking lot and construction of the proposed project would not result in a significant impact to adjacent historic resources.	LS	NI	LS =/<	LS =

Commented [JK11]: Stantec to updated once population and housing section is completed.

Impact Statement	Proposed Project	Alternative A: No Project Alternative	Alternative B: Reduced Density Alternative	Alternative C: No Residential Parking, Tower Only Alternative
Impact C-CR-1: The proposed project, in combination with cumulative projects, would not result in demolition and/or alteration of historical resources, as defined in CEQA Guidelines section 15064.5.	LS	NI	LS =/<	LS =/>
Geology and Soils				
Impact GE-1: The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismically related ground failure, liquefaction, or landslides.	LS	NI	LS =	LS =
Impact GE-3: The proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	LS	NI	LS =	LS =
Impact GE-4: The proposed project would not result in a substantial risk of loss, injury, or death related to expansive soils as defined in Table 18-1-B of the Uniform Building Code.	LS	NI	LS =	LS =
Impact C-GE-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to geology and soils.	NI	NI	NI	NI

Notes:

NI (no impact); LS (less than significant); LSM (less than significant with mitigation); SU (significant and unavoidable, no feasible mitigation measures available); = (equal to); < (less than); > (greater than)

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