

CHAPTER 5

Alternatives to the Project

Pursuant to the provisions of CEQA, this chapter describes and evaluates alternatives to the proposed project, including a “No Project” alternative, and identifies an “environmentally superior” alternative. The primary purpose of this section is to provide decision-makers and the public with a qualitative review of project alternatives that eliminate or substantially reduce any of a project’s adverse environmental impacts while, at the same time, attaining most of the basic project objectives.

A. CEQA Requirements

CEQA *Guidelines* Section 15126.6 requires that an EIR describe and evaluate a range of reasonable alternatives to the project or to the location of the project that could avoid or substantially lessen any of the significant effects of the project and feasibly attain most of its basic objectives. The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to foster informed decision-making and public participation (Section 15126.6(a), (f)). The CEQA *Guidelines* generally define “feasible” to mean an alternative that is capable of being accomplished in a successful manner within a reasonable amount of time, taking into account economic, environmental, social, technological, and legal factors. In addition, the following may be taken into consideration when assessing the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control (CEQA *Guidelines* Section 15126.6(f)(1)). As stated in Section 15126.6(f)(3) of the CEQA *Guidelines*, “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.”

The description or evaluation of alternatives does not need to be exhaustive. An EIR need not describe or evaluate the environmental effects of alternatives in the same level of detail as the proposed project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project (CEQA *Guidelines* Section 15126.6(d)).

As noted above, a “No Project” alternative must also be evaluated. The analysis of the No Project Alternative is based on what could be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services (CEQA *Guidelines* Section 15126.6(e)(2)).

CEQA also requires that an environmentally superior alternative be selected among the alternatives. In general, the environmentally superior alternative is defined as that alternative with the least adverse impacts on the project site and its surrounding environment. When the “No Project” Alternative is the environmentally superior alternative, an EIR must also identify an environmentally superior alternative among the other alternatives (CEQA *Guidelines* Section 15126.6 (e)(2)).

B. Factors in the Selection of Alternatives

The CEQA *Guidelines* recommend that an EIR briefly describe the rationale for selecting the alternatives to be discussed, identify any alternatives that were considered by the lead agency but were rejected as infeasible, and briefly explain the reasons underlying the lead agency’s determination (CEQA *Guidelines* Section 15126.6(c)). The following factors were considered in identifying the reasonable range of alternatives to the project for this Draft EIR:

- The extent to which the alternative would accomplish most of the basic goals and objectives of the project;
- The extent to which the alternative would avoid or lessen the identified significant and/or unavoidable environmental effects of the project;
- Requests by interested parties and community members at the scoping meeting for information regarding the relative environmental impacts of different number of housing units;
- The feasibility of the alternative, taking into account site suitability, availability of infrastructure, general plan consistency, and consistency with other applicable plans and regulatory limitations;
- The extent to which an alternative contributes 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)).

As discussed in the Initial Study (**Appendix A**), the proposed project’s impacts to aesthetics (in regards to scenic resources and light and glare, alone), biological resources, cultural resources, geology and soils, greenhouse gas emissions, hydrology and water quality, land use and planning, population and housing, public services, recreation, tribal cultural resources, and utilities and service systems would be less than significant. The proposed project’s impacts to air quality, hazards and hazardous materials, and noise would be less than significant with mitigation. The project would have no impact to agriculture and forestry resources and mineral resources. As discussed in Section 4.A, *Aesthetics*, the proposed project would result in less than significant impacts related to visual character and quality. In addition, as identified in Section 4.B, *Transportation and Traffic*, the proposed project would result in a significant and unavoidable impact under Cumulative plus Project conditions at the intersection of Mission Boulevard (SR-238)/ Niles Boulevard-Niles Canyon Road. The alternatives analysis, therefore, focuses on

project alternatives that could avoid or substantially lessen the transportation and traffic impacts of the project.

The following alternatives are evaluated in this chapter of the Draft EIR:

- No Project Alternative
- Alternative 1: 86-Unit Reduced Density Alternative
- Alternative 2: 75-Unit Reduced Density Alternative

C. Project Objectives

As discussed in Chapter 3 of the EIR, the following are the identified objectives for the project:

- Redevelop the former industrial site with a mixed-use project that would serve as a gateway into the Niles Community and would be consistent with the *Niles Design Guidelines and Regulations (2002)*.
- Consistent with the vision outlined in the Niles Community Plan, convert the vacant, remnant industrial site to a productive use that includes a mix of commercial, residential and/or live-work uses, amenities, and access to Alameda Creek.
- Enhance the character of the adjacent Niles Town Center with a project that is compatible in scale and design with existing development, continuing streetscape and signage improvements, enhancing gateways, and maintaining a comfortable environment for pedestrians.
- Provide a trail connection between the Niles Town Center, Alameda Creek, and the regional park system.
- Provide additional retail space in Niles, leveraging the District's historic character to retain existing businesses and encourage new retail uses for residents, and visitors.
- Develop high quality and well-designed housing at a density consistent with housing inventory identified the General Plan Housing Element.
- Promote land use compatibility between the proposed mixed use development and the adjoining neighborhood through the use of site planning techniques.
- Create a continuous and safe walking environment for pedestrians in conformance with the goals and policies of the Mobility Element of the General Plan.

D. Description and Analysis of Alternatives

A description of each alternative is followed by a discussion of its impacts and how the alternative would differ from the impacts of the proposed project. As permitted by CEQA, the significant effects of the alternatives are discussed in less detail than are the effects of the proposed project (CEQA *Guidelines*, Section 15126.6(d)). However, the analysis is conducted at a sufficient level of detail to provide decision-makers adequate information to fully evaluate the alternatives and to approve any of the alternatives without further environmental review, should that be the desire of the decision-makers if the proposed project is not approved.

No Project Alternative

Consideration of a No Project Alternative is required under CEQA. According to Section 15126.6(e)(3)(B) if a project is other than a land use or regulatory plan such as a development project on identifiable property, the No Project Alternative “is the circumstance under which the project does not proceed.” The No Project Alternative would not preclude development of the site by another project in the future. However, it would be speculative to consider effects of such a potential future project at this time. Therefore, pursuant to Section 15126.6(e)(3)(B), the No Project Alternative for purposes of this analysis is considered “no build” wherein the existing environmental setting is maintained.

Compliance of No Project Alternative with Project Objectives

The No Project Alternative would not meet the project objectives for the proposed project. Existing physical conditions would remain unchanged at the site under this alternative. Existing conditions consist of ornamental trees and shrubs located around the site perimeter; weedy vegetation within the center of the site; building foundation remnants from former industrial uses across much of the site; and debris piles containing soil, broken paving materials, and discarded items throughout the site.

Under the No Project Alternative, the former industrial site would not be redeveloped with a mixed-use project that would serve as a gateway into Niles consistent with the vision outlined in the Niles Community Plan. Additional retail space for Niles, leveraging the district’s historic character to retain existing businesses and encourage new retail uses for residents, and visitors, would not be provided under this alternative. The No Project Alternative, would not meet the project objectives to develop the site with high-quality and well-designed housing at a density consistent with housing inventory identified the General Plan Housing Element.

It is possible that future development of the project site could occur with currently permitted uses, such as automotive repair, general warehouse, manufacturing, research and development, or offices, but it would be speculative to evaluate the impacts of such a project at this time. The No Project Alternative, if selected, would not meet the objectives of the proposed project.

Impacts

Aesthetics

Under the No Project Alternative, existing visual conditions would remain unchanged at the site. No new structures or landscaping would be added to the site, and the less than significant impact identified for the proposed project would not occur.

Transportation and Traffic

Under the No Project Alternative, it is assumed that the site would remain unchanged and there would be no increase in traffic to or from the project site. As shown in **Table 4.B-11**, Mission Boulevard (SR-238) / Niles Boulevard - Niles Canyon Road would operate at an unacceptable

level of service during the p.m. peak hour. This alternative would have no impact on the level of service because there would be no development at the site.

Under the No Project Alternative, the less-than-significant impacts related to increased traffic volumes on the area roadway network, increased hazards due to a design feature or incompatible uses, inadequate emergency access, and performance of public transit and non-motorized travel modes would not occur.

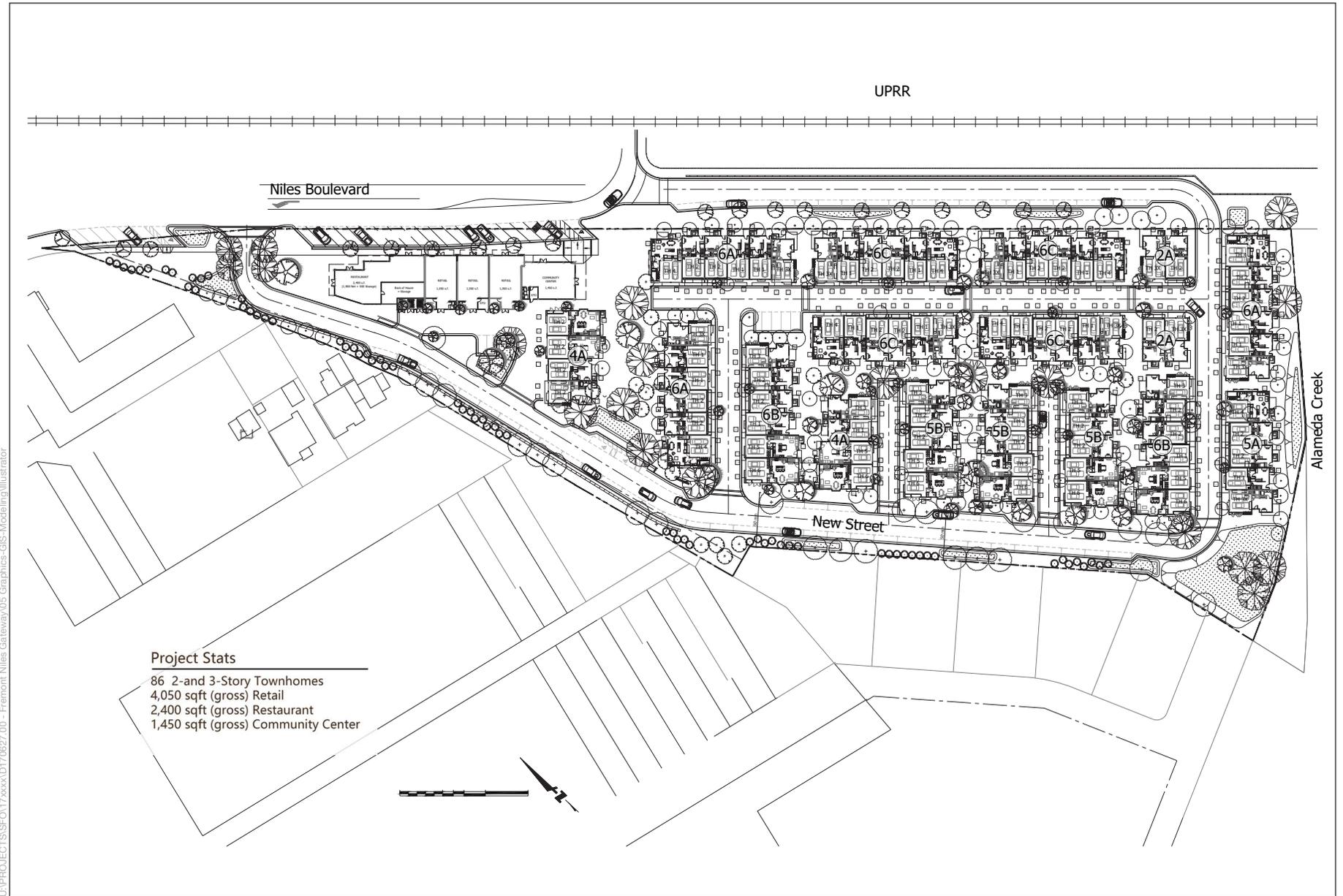
Other Issues

Impacts related to other environmental topic areas that were found to be less than significant or less than significant with mitigation in the Initial Study Checklist completed for the project (see **Appendix A**) are discussed below in relation to the No Project Alternative.

- No agricultural and forestry resources or mineral resources occur on the project site. Therefore, there would be no impact to agricultural and forestry resources or mineral resources under the proposed project or the No Project Alternative.
- Visual conditions at the site would remain unchanged under the No Project Alternative. No impacts on scenic resources or light and glare would occur.
- The site would remain unchanged from its existing condition. Therefore, no impacts related to land use and planning and population and housing would occur.
- No impacts related to biological resources, cultural resources, tribal cultural resources, and noise would occur since there would be no construction under the No Project Alternative. The mitigation measures identified for noise would not be required. Impacts would be less than the proposed project.
- There would be no operational impacts under the No Project Alternative. Because no development would occur, there would be no increase in demand for public services (i.e., fire and police protection services, schools, and parks) and utilities (i.e., water supply, wastewater conveyance and treatment, stormwater drainage systems, and solid waste disposal). Impacts would be less than the proposed project.
- The impacts associated with traffic-generated air quality impacts, greenhouse gas, and noise emissions would not occur under the No Project Alternative. The No Project Alternative would have no impact, and impacts would be less than the proposed project.

Alternative 1 – 86-Unit Reduced Density Alternative

Under the 86-unit Reduced Density Alternative (Alternative 1), the nine residential units located above the CRAFT building along Niles Boulevard under the proposed project would be excluded. Consequently, there would be no mixed-use development fronting Niles Boulevard under this alternative. As shown on **Figure 5-1**, Alternative 1 would include 86 residential units in two-to-three-story townhouses that would be developed on the remainder of the site in the same configuration as the proposed project. Alternative 1 would also include 1,450 square feet of community center space, which is the same as under the proposed project. Alternative 1 would include 4,050 square feet of retail space and 2,400 square feet restaurant space, which would be an additional 1,000 square feet of retail/restaurant than under the proposed project. The restaurant



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SOURCE: Valley Oak Partners, 2018

Niles Gateway Mixed-Use Project

Figure 5-1
Alternative 1 Site Plan



area under Alternative 1 would be in same space and configuration as the proposed project, while retail space would extend to where garages for the excluded 9 residential units located above the CRAFT building would be located under proposed project.

Compliance of Alternative 1 with Project Objectives

This alternative would meet the project objectives for the proposed project. The 86-Unit Reduced Density Alternative would entail redevelopment of the former industrial site with a mixed-use project that would serve as a gateway into Niles and would be consistent with the *Niles Design Guidelines and Regulations*. Consistent with the vision outlined in the Niles Community Plan, Alternative 1 would convert the vacant, remnant industrial site to a productive use that includes a mix of commercial and residential uses, amenities, and access to the Alameda Creek Trail. As with the proposed project, Alternative 1 would provide a connection between the Niles Town Center and Alameda Creek, and would create a continuous and safe walking environment for pedestrians in conformance with the goals and policies of the Mobility Element of the General Plan. Alternative 1 would provide additional retail space in Niles and would contribute housing at a density slightly greater than the housing inventory identified the General Plan Housing Element.

Impacts

Aesthetics

While the nine residential units located above the CRAFT building along Niles Boulevard under the proposed project would be excluded under Alternative 1, the overall design and aesthetic character of Alternative 1 would be largely the same as proposed project. Instances where Alternative 1 would not comply with applicable guidelines (i.e., *the Niles Design Guidelines and Regulations*) would be largely the same as those under the proposed project (e.g., absence of keyhole entries, width of storefront entries, and non-compliant awning design, as described in the discussion of Impact 4.A-1 Section 4.A, *Aesthetics*). As with the proposed project, minor design variations under Alternative 1 would be appropriate and would not substantially degrade the existing visual character or quality of the project site and its surroundings. In addition, the exclusion of the nine residential units located above the CRAFT building would reduce the building height fronting Niles Boulevard in comparison to the proposed project, which could be perceived as more aesthetically pleasing to certain viewers. Notwithstanding this reduction in proposed height, as with the proposed project, aesthetic impacts under Alternative 1 would be less than significant.

Transportation and Traffic

As with the proposed project, it is anticipated that impacts under Alternative 1 related to increased hazards due to a design feature or incompatible uses, inadequate emergency access, and performance of public transit and non-motorized travel modes would be less than significant with no mitigation required.

As described in Section 4.B, *Transportation and Traffic*, the proposed project would result in a significant and unavoidable impact at Mission Boulevard (SR-238) / Niles Boulevard - Niles Canyon Road during the p.m. peak hour under Cumulative plus Project conditions. W-Trans conducted a sensitivity analysis and determined that this significant and unavoidable impact could be avoided by reducing the project size from 95 dwelling units to 93 dwelling units. With 93 dwelling units, the intersection would still operate at LOS F with 151.9 seconds of delay anticipated during the weekday p.m. peak hour, but would not exceed the threshold of significance.

The reduced development of 86 dwelling units under Alternative 1 would result in fewer generated trips than the proposed project. As shown in **Table 5-1**, Alternative 1 would generate 984 trips per day, and would reduce the average delay attributed to the proposed project to less than four seconds. Under the Cumulative plus Alternative 1 conditions, the significant and unavoidable impact at Mission Boulevard (SR-238) / Niles Boulevard – Niles Canyon Road would be eliminated. A summary of the trip generation is provided in **Table 5-1**.

**TABLE 5-1
ALTERNATIVE 1 TRIP GENERATION SUMMARY**

Scenario	Units	Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Multifamily Housing (Low-Rise)	86 du	7.32	630	0.56	48	13	35	0.67	58	34	24
Quality Restaurant	2.4 ksf	83.84	201	4.47	11	9	2	8.28	20	12	8
Shopping Center	4.05 ksf	37.75	153	3.00	12	7	5	4.21	17	9	8
Internal Trip Reduction				-8%	-4	-1	-3	-15%	-9	-5	-4
Total			984		67	28	39		86	50	36

NOTE: ksf = 1,000 square feet; du = dwelling units

SOURCE: W-Trans, 2018, using ITE, *Trip Generation Manual*, 10th Edition, 2017 (Appendix D).

Other Issues

Impacts related to other environmental topic areas that were found to be less than significant or less than significant with mitigation in the Initial Study Checklist completed for the project (see **Appendix A**) and are discussed below in relation to Alternative 1.

- No agricultural and forestry resources or mineral resources occur on the project site. Therefore, there would be no impact to agricultural and forestry resources or mineral resources under the proposed project or Alternative 1.
- Similar to the proposed project, Alternative 1 would have less-than-significant impacts related to land use and planning, and population and housing. Alternative 1 would not physically divide an established community. As with the proposed project, a General Plan Amendment and Rezoning of the project site would occur under this alternative. As with the proposed project, Alternative 1 would not induce substantial population growth in the City of Fremont.

- Similar types of construction activities would occur under Alternative 1. Therefore, construction-related impacts related to biological resources, cultural resources, tribal cultural resources, and noise would be similar to the proposed project and remain less than significant with mitigation, and the same mitigation measures identified for the proposed project for those impacts would be required for Alternative 1.
- Operational impacts under Alternative 1 would be less than those under the proposed project because there would be fewer residential units. Consequently, demand for public services (i.e., fire and police protection services, schools, and parks) and utilities (i.e., water supply, wastewater conveyance and treatment, stormwater drainage systems, and solid waste disposal) would be less than the proposed project.
- Traffic-generated air quality impacts, greenhouse gas, and noise emissions under Alternative 1 would be less than those generated by the proposed project, due to the fewer residential units, and impacts would remain less than significant with mitigation. The same or reduced mitigation measures identified for the proposed project for those impacts would be required for the Alternative 1.

Alternative 2 – 75-Unit Reduced Density Alternative

Under the 75-Unit Reduced Density Alternative (Alternative 2), the 13 CRAFT building under the proposed project would be excluded. Consequently, there would be no mixed-use development fronting Niles Boulevard under this alternative. As shown on **Figure 5-2**, Alternative 2 would include 75 residential units in two-story townhouses that would be developed on the remainder of the site south of the 90-degree turn of Niles Boulevard towards Mission Boulevard in generally the same configuration as the proposed project but at a height of approximately 20 feet as opposed to the 30-foot height of the two- and three-story townhouses under the proposed project. Alternative 2 would include 1,450 square feet of community center space, which is the same as under the proposed project. Alternative 2 would also include 4,050 square feet of retail space and 2,400 square feet restaurant space, which would be an additional 1,000 square feet of retail/restaurant than under the proposed project. The restaurant area under Alternative 2 would be in same space and configuration as the proposed project, while retail space would extend to where garages for the residential units would be located under proposed project.

Compliance of Alternative 2 with Project Objectives

This alternative would meet the project objectives for the proposed project. The 75-Unit Reduced Density Alternative would entail redevelopment of the former industrial site with a mixed-use project that would serve as a gateway into the Niles Community and would be consistent with the Niles Design Guidelines and Regulations. Consistent with the vision outlined in the Niles Community Plan, Alternative 2 would convert the vacant, remnant industrial site to a productive use that includes a mix of commercial, residential and/or live-work uses, amenities, and access to Alameda Creek. As with the proposed project, Alternative 2 would provide a connection between the Niles Town Center and Alameda Creek, and would create a continuous and safe walking environment for pedestrians in conformance with the goals and policies of the Mobility Element of the General Plan. Alternative 2 would provide additional retail space in Niles and would contribute housing at a density consistent with the housing inventory identified the General Plan Housing Element.

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Project Stats
75 2-Story Townhomes
4,050 sqft (gross) Retail
2,400 sqft (gross) Restaurant
1,450 sqft (gross) Community Center

SOURCE: Valley Oak Partners, 2018

Niles Gateway Mixed-Use Project

Figure 5-2
Alternative 2 Site Plan



Impacts

Aesthetics

While the 13 residential units located above the CRAFT building along Niles Boulevard under the proposed project would be excluded under Alternative 1, the overall design and aesthetic character of Alternative 2 would be similar to the proposed project. Instances where Alternative 1 would not comply with applicable guidelines (i.e., *the Niles Design Guidelines and Regulations*) would be largely the same as those under the proposed project (e.g., absence of keyhole entries, width of storefront entries, and non-compliant awning design, as described in the discussion of Impact 4.A-1 Section 4.A, *Aesthetics*). As with the proposed project, minor design variations under Alternative 2 would be appropriate and would not substantially degrade the existing visual character or quality of the project site and its surroundings. In addition, the exclusion of the 13 CRAFT building residential units and the reduction of townhome heights from three to two stories in comparison to the proposed project could be perceived as more aesthetically pleasing to certain viewers, as the project building heights would be substantially reduced overall. Notwithstanding this reduction in proposed heights and potential associated reduction of aesthetic impacts, as with the proposed project, aesthetic impacts under Alternative 2 would be less than significant.

Transportation and Traffic

As with the proposed project, it is anticipated that impacts under Alternative 2 related to increased hazards due to a design feature or incompatible uses, inadequate emergency access, and performance of public transit and non-motorized travel modes would be less than significant with no mitigation required.

As described in Section 4.B, *Transportation and Traffic*, the proposed project would result in a significant and unavoidable impact at Mission Boulevard (SR-238) / Niles Boulevard - Niles Canyon Road during the p.m. peak hour under Cumulative plus Project conditions. W-Trans conducted a sensitivity analysis and determined that this significant and unavoidable impact could be avoided by reducing the project size from 95 dwelling units to 93 dwelling units. With 93 dwelling units, the intersection would still operate at LOS F with 151.9 seconds of delay anticipated during the weekday p.m. peak hour, but would not exceed the threshold of significance.

The reduced development of 75 dwelling units under Alternative 2 would result in fewer generated trips than the proposed project. As shown in **Table 5-2**, Alternative 2 would generate 903 daily trips, compared to the proposed project's 1,027 trips. Therefore, Alternative 2 would reduce the average delay attributed to the proposed project to less than four seconds. Under the Cumulative plus Alternative 2 conditions, the significant and unavoidable impact at Mission Boulevard (SR-238) / Niles Boulevard – Niles Canyon Road would be eliminated.

**TABLE 5-2
ALTERNATIVE 2 TRIP GENERATION SUMMARY**

Scenario	Units	Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Multifamily Housing (Low-Rise)	75 du	7.32	549	0.56	42	12	30	0.67	50	30	20
Quality Restaurant	2.4 ksf	83.84	201	4.47	11	9	2	8.28	20	12	8
Shopping Center	4.05 ksf	37.75	153	3.00	12	7	5	4.21	17	9	8
Internal Trip Reduction				-8%	-3	-1	-2	-15%	-8	-5	-3
Total			903		62	27	35		80	47	33

NOTE: ksf = 1,000 square feet; du = dwelling units

SOURCE: W-Trans, 2018, using ITE, *Trip Generation Manual*, 10th Edition, 2017 (Appendix D).

Other Issues

Impacts related to other environmental topic areas that were found to be less than significant or less than significant with mitigation in the Initial Study Checklist completed for the project (see **Appendix A**) and are discussed below in relation to the Alternative 2.

- No agricultural and forestry resources or mineral resources occur on the project site. Therefore, there would be no impact to agricultural and forestry resources or mineral resources under the proposed project or Alternative 2.
- Similar to the proposed project, Alternative 2 would have less-than-significant impacts related to land use and planning, and population and housing. Alternative 2 would not physically divide an established community. As with the proposed project, a General Plan Amendment and Rezoning of the project site would occur under this alternative. This alternative would include 20 fewer residential units than the proposed project, thereby further reducing the proposed project's less-than-significant impacts related to inducing substantial population growth in the City of Fremont.
- Similar types of construction activities would occur under Alternative 2. Therefore, construction-related impacts related to biological resources, cultural resources, tribal cultural resources, and noise would be similar to the proposed project and remain less than significant with mitigation, and the same mitigation measures identified for the proposed project for those impacts would be required for Alternative 2.
- Operational impacts under Alternative 2 would be less than those under the proposed project because there would be fewer residential units. Consequently, demand for public services (i.e., fire and police protection services, schools, and parks) and utilities (i.e., water supply, wastewater conveyance and treatment, stormwater drainage systems, and solid waste disposal) would be less than the proposed project.
- Traffic-generated air quality impacts, greenhouse gas, and noise emissions under Alternative 2 would be less than those generated by the proposed project, due to the fewer residential units, and impacts would remain less than significant with mitigation. The same or reduced mitigation measures identified for the proposed project for those impacts would be required for the Alternative 2.

E. Environmentally Superior Alternative

A summary table showing the differences between the alternatives and the proposed project (after mitigation) is provided in **Table 5-3**. The proposed project’s impacts to geology, soils, and seismicity; greenhouse gas emissions; hydrology and water quality; land use and planning; population and housing; public services; recreation; and utilities and service systems would be less than significant, and mitigation would be required to reduce the project’s potentially significant impacts to air quality; biological resources; cultural resources; tribal cultural resources; hazards and hazardous materials; and noise to a less-than-significant level. The mitigation measures identified in this EIR and in the Initial Study (**Appendix A**) that would apply to the proposed project would apply to Alternatives 1 and 2.

**TABLE 5-3
ALTERNATIVES IMPACT SUMMARY AND COMPARISON**

Impact	Proposed Project	No Project	Alternative 1	Alternative 2
Aesthetics	LTS	NI	LTS ↓	LTS ↓
Agricultural and Forestry Resources	NI	NI	NI	NI
Air Quality	LTSM	NI	LTSM ↓	LTSM ↓
Biological Resources	LTSM	NI	LTSM	LTSM
Cultural Resources	LTSM	NI	LTSM	LTSM
Geology, Soils, and Seismicity	LTS	NI	LTS	LTS
Greenhouse Gas Emissions	LTS	NI	LTS ↓	LTS ↓
Hazards and Hazardous Materials	LTSM	NI	LTSM	LTSM
Hydrology and Water Quality	LTS	NI	LTS	LTS
Land Use and Planning	LTS	NI	LTS	LTS
Noise	LTSM	NI	LTSM ↓	LTSM ↓
Population and Housing	LTS	NI	LTS ↓	LTS ↓
Public Services and Utilities	LTS	NI	LTS ↓	LTS ↓
Recreation	LTS	NI	LTS ↓	LTS ↓
Transportation and Traffic	SU	NI	LTS ↓	LTS ↓
Tribal Cultural Resources	LTSM	NI	LTSM	LTSM
Utilities and Service Systems	LTS	NI	LTS ↓	LTS ↓

NOTES: ↑/↓ - The impact is more/less severe than compared to the proposed project.

SOURCE: Compiled by ESA, 2018

CEQA requires that, among the alternatives, an “environmentally superior” alternative be selected and that the reasons for such selection be disclosed. In general, the environmentally superior alternative is the alternative that would generate the fewest or least severe adverse impacts. The No Project Alternative is environmentally superior to the Reduced Density Alternatives as it would avoid the environmental impacts of the proposed project. However, the No Project Alternative would not achieve the project objectives.

CEQA requires that that a second alternative be identified when the No Project alternative is the environmentally superior alternative (CEQA Guidelines, Section 15126.6(e)). Therefore, Alternative 2 (75-Unit Reduced Density Alternative) is the environmentally superior alternative because, due to its substantial reduction in residential units in comparison to the proposed project, it would eliminate the significant-and-unavoidable impact related to cumulative intersection operations and would also further reduce less-than-significant impacts on other resource topics while meeting most of the basic objectives of the project.

F. Alternatives Considered but Rejected

CEQA *Guidelines* Section 15126.6 sets forth several requirements regarding the consideration of alternatives in an EIR. This section and related case law hold that alternatives that are not reasonable or are infeasible need not be discussed at length; alternatives that do not offer substantial environmental advantages over the project can be rejected from consideration; and alternatives that do not accomplish most of the basic objectives of the project can be excluded from detailed analysis.

60-Unit Reduced Density Alternative

A 60-Unit Reduced Density Alternative was considered but ultimately rejected for further consideration. Under a 60-Unit Reduced Density Alternative, the 13 CRAFT building residential units under the proposed project would be excluded. Consequently, there would be no mixed-use development fronting Niles Boulevard under this alternative. This alternative would include 60 residential units in two-story townhouses that would be developed on the remainder of the site. This alternative was rejected from further consideration because it would not meet the project objective to develop housing at a density consistent with the housing inventory identified in the General Plan Housing Element, which identifies a density of 75 units on the project site.

Off-Site Location

An alternative off-site location other than the project site has not been identified because the project is location specific. The purpose of this project is to redevelop the former industrial site with a mixed-use project that is consistent with the *Niles Design Guidelines and Regulations*, provide additional retail space in Niles, and develop housing which would contribute towards meeting the City's Regional Housing Needs Allocation. The project proposes to increase development potential within this City-identified Special Study Area, consistent with the Niles Community Plan Policy to encourage redevelopment of this site with a mix of commercial, residential and/or live-work uses. The Fremont General Plan's designation of Special Study Area reflects current allowable uses, however, the General Plan acknowledges that these areas may also transition to new uses in the long-term. As such, the project site was identified as property that may be considered for a future General Plan Amendment to a more intense use with appropriate environmental review. Accordingly, no off-site alternative has been carried forward for detailed analysis.