7.0 Alternatives to the Proposed Project
7.0 ALTERNATIVES TO THE PROPOSED PROJECT

In accordance with CEQA Guidelines Section 15126.6, the following section describes a range of reasonable alternatives to the proposed project, which could feasibly attain most of the basic objectives of the proposed project but would avoid or substantially lessen significant effects of the proposed project. The evaluation considers the comparative merits of each alternative. The analysis focuses on alternatives capable of avoiding significant environmental effects or reducing them to less than significant levels, even if these alternatives would impede, to some degree, the attainment of the proposed project objectives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. If the Lead Agency approves to carry out a project for which an EIR has been certified which identifies one or more significant environmental effects, the Lead Agency is required to make written findings, in accordance with CEQA Guidelines Section 15091.

Potential environmental impacts associated with two separate alternatives are compared to impacts from the proposed project. The alternatives include:

- No Project/Existing General Plan Alternative; and
- Reduced Project Alternative.

Throughout the following analysis, impacts of the alternatives are analyzed for each of the issue areas examined in Section 5.0 of this EIR. In this manner, each alternative can be compared to the proposed project on an issue-by-issue basis. Table 7-1, Comparison of Alternatives, provides an overview of the alternatives analyzed and a comparison of each alternative’s impact in relation to the proposed project. The section concludes with a review of alternatives considered but rejected for further analysis.

Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. The proposed project would result in significant and unavoidable impacts in the following environmental issue areas:

- Air Quality
  - Short-term construction air emissions impacts;
  - Long-term operational impacts;
  - Plan consistency impacts;
  - Cumulative construction air quality impacts; and
  - Cumulative operational air quality impacts.

- Noise
  - Short-term construction impacts;
  - On-site mobile source noise impacts;
  - Cumulative short-term noise impacts; and
  - Cumulative long-term noise impacts.
• Public Services and Utilities
  - Library Facilities;
  - Water Supply; and
  - Cumulative library facilities and water supply.

• Traffic, Circulation and Parking
  Forecast Year 2030 With Project With Four-Lane Lancaster Boulevard
  - 20th Street West/SR-14 Northbound Off-Ramp (project and cumulative);
  - 10th Street West/Avenue J (project and cumulative); and
  - 10th Street West/Avenue J (project and cumulative).
  Forecast Year 2030 With Project With Two-Lane Lancaster Boulevard
  - 10th Street West/Lancaster Boulevard (project and cumulative);
  - 20th Street West/SR-14 Northbound Off-Ramp (project and cumulative);
  - 10th Street West/Avenue J (project and cumulative); and
  - Division Street/Avenue J (project and cumulative).

An EIR must identify an “environmentally superior” alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify an environmentally superior alternative from among the others evaluated. Each alternative’s environmental impacts are compared to the proposed project and determined to be environmentally superior, inferior or neutral. However, only those impacts found to be significant and unavoidable for the proposed project are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project.

7.1 “NO PROJECT/EXISTING GENERAL PLAN” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The No Project/Existing General Plan Alternative assumes the proposed Downtown Lancaster Specific Plan Project would not be implemented. The existing mixture of civic, cultural, commercial, office and residential uses would remain as they currently exist. Vacant and underutilized sites within the project area would be developed consistent with the existing General Plan land use designations with up to 200 dwelling units and 100,000 s.f. of commercial/retail space. Under the No Project/Existing General Plan Alternative, the project area would consist of 575,879 s.f. of commercial/retail space, 640,020 s.f. of office/civic/public space and 452 dwelling units.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

The No Project/Existing General Plan Alternative does not involve any development that would affect land use plans or policies of the City or other local and regional agencies. This Alternative would not require a General Plan Amendment from the existing land use designations (Commercial, Light Industrial, Public, Urban Residential and Medium Density Residential) to Downtown Lancaster Specific Plan. Additionally, this Alternative would not require a Zone Change from the existing zoning (Central Business District, General Commercial, Commercial Planned Development, Office Professional, Public, High-Density
Residential and Low-Density Residential (R-7000) to Downtown Lancaster Specific Plan. The No Project/Existing General Plan Alternative would be consistent with the Redevelopment Plan for the Lancaster Central Business District Redevelopment Project, which identifies revitalization of the historic core of the Downtown area as its primary goal and the Housing Element, which promotes infill housing development in areas committed to urban development. Therefore, this Alternative would be consistent with the goals and policies of the Redevelopment Plan and the General Plan. As both the proposed project and this Alternative would not result in significant and unavoidable land use impacts, the No Project/Existing General Plan Alternative would be considered neither environmentally inferior nor superior to the proposed project in this regard.

**Aesthetics/Light and Glare**

The No Project/Existing General Plan Alternative would alter existing views of and across the project area from off-site vantage points, similar to the proposed project. Aesthetic improvements, such as development consistent with design regulations and design guidelines, public plazas and paseos, and pedestrian walkways in the Downtown would not occur with this Alternative, as area specific land use regulations and design guidelines would not be implemented. The No Project/Existing General Plan Alternative would introduce new sources of light and glare to the project area, but to a lesser degree than the proposed project. As with the proposed project, potential light and glare impacts would be minimized through the City’s discretionary review process, approval of development proposals and implementation of mitigation measures. The short-term impacts associated with construction activities would be slightly reduced under this Alternative, as it would result in less intensity of construction activities and associated equipment, and possibly a reduced construction schedule. This Alternative would be considered environmentally superior to the proposed project in this regard.

**Traffic, Circulation and Parking**

The No Project/Existing General Plan Alternative would result in approximately 29,624 fewer average daily trips when compared to the proposed project. As noted in Section 5.3, Traffic and Circulation, the proposed project is forecast to generate approximately 35,704 additional daily trips. This Alternative would eliminate the significant and unavoidable traffic impacts that would occur with the proposed project. This Alternative would provide parking on-site in accordance with the City’s Municipal Code. Similar to the proposed project, impacts to parking would be less than significant. The No Project/Existing General Plan Alternative would be considered environmentally superior to the proposed project in regards to traffic and parking.

**Air Quality**

The amount of development under the No Project/Existing General Plan Alternative would be less than the proposed project and, therefore, emissions from building activities would be less on a daily basis. However, similar to the proposed project, the potential exists that ambient air quality standards for O₃, PM₁₀, and PM₂.₅ may be exceeded. Construction related air quality impacts would be significant and unavoidable with this Alternative. However, the significant and unavoidable long-term operations impact that would occur with the proposed project would be reduced to a less than significant level with this Alternative due to fewer vehicle trips. The No Project/Existing General Plan Alternative would be consistent with the regional air quality plan, as it would not increase the intensity of land uses within the project area beyond that anticipated
in the City’s General Plan. The No Project/Existing General Plan Alternative would be considered environmentally superior to the proposed project in this regard.

**Noise**

The No Project/Existing General Plan Alternative would involve development at a lower intensity than compared to the proposed project. The short-term impacts associated with construction activities would be reduced under this Alternative, as it would result in less construction activities and associated equipment. However, similar to the proposed project, construction noise impacts would be significant and unavoidable. When compared to the proposed project, noise levels would decrease due to less vehicular traffic. The No Project/Existing General Plan Alternative would result in less than significant mobile source noise impacts due to the reduction in vehicular traffic, when compared to the proposed project. Noise impacts from other operational sources (e.g., mechanical equipment) would be less than significant. As significant noise impacts would be reduced, the No Project/Existing General Plan Alternative would be considered environmentally superior to the proposed project in this regard.

**Population and Housing**

The No Project/Existing General Plan Alternative would involve fewer residential units and the reduction of commercial/retail uses, which would result in a reduction of population and housing growth when compared to the proposed project. As noted in Section 5.6, Population and Housing, the proposed project could result in a direct increase to the City’s population of approximately 7,864 persons (approximately 6,775 persons from additional housing and 1,089 persons potentially relocating to the City to fill new positions). This Alternative would involve a reduction in development, resulting in a reduction in population growth when compared to the proposed project. The No Project/Existing General Plan Alternative could result in a direct increase to the City’s population of approximately 473 persons (approximately 414 persons from additional housing and 59 persons potentially relocating to the City to fill new positions). Similar to the proposed project, the potential population growth would be consistent with SCAG’s projected 2030 population. Therefore, the No Project/Existing General Plan Alternative would be considered neither environmentally superior nor inferior to the proposed project in this regard.

**Public Services and Utilities**

The No Project/Existing General Plan Alternative involves fewer residential and commercial/retail uses and no increase in office/civic/public uses when compared to the proposed project. Therefore, this Alternative would result in a reduction in affects to fire and police protection services, schools, libraries and parks and recreational facilities when compared to the proposed project. Additionally, the reduction in development with this Alternative would result in less demand for water and reduced wastewater and solid waste generation when compared to the proposed project. However, similar to the proposed project, the availability of adequate water supply cannot be guaranteed and the increase in population from this Alternative would contribute to the existing library deficiency, resulting in significant and unavoidable impacts. The No Project/Existing General Plan Alternative would be considered neither environmentally superior nor inferior to the proposed project in this regard.
Cultural Resources

Similar to the proposed project, the No Project/Existing General Plan Alternative could result in direct or indirect impacts to cultural resources related to a substantial adverse change in the significance of a historical resource. Compliance with identified mitigation measures would reduce the potential impacts to a less than significant level. With this Alternative, the potential disturbance or destruction of undocumented archaeological and/or paleontological resources could occur; however, compliance with Public Resources Code Sections 5097.98 and 5097.99 would reduce impacts to a less than significant level. The No Project/Existing General Plan Alternative would be considered neither environmentally inferior nor superior to the proposed project in this regard.

Hazards and Hazardous Materials

Under the No Project/Existing General Plan Alternative, impacts related to hazards and hazardous materials would not substantially change relative to the proposed project, as commercial and retail/restaurant uses that use, store, handle, and dispose of very limited, if any, quantities of hazardous materials and wastes would be developed. As with the proposed project, removal of buildings may occur with this Alternative, requiring removal and disposal of potentially hazardous materials. Emergency response and evacuation plan impacts would be comparable to those of the proposed project. As such, this Alternative would be considered neither environmentally superior nor inferior to the proposed project in this regard.

Hydrology and Water Quality

With this Alternative, the short-term impacts on water quality associated with grading, excavation, and construction activities in the project area would be similar to those of the proposed project. As with the proposed project, the existing quality and quantity of storm water and urban runoff would be impacted with this alternative, as existing vacant land would be developed. Similar to the proposed project, drainage improvements would be required with implementation of the No Project/Existing General Plan Alternative. As such, this Alternative would be considered neither environmentally superior nor inferior to the proposed project in this regard.

ABILITY TO MEET THE PROJECT’S OBJECTIVES

The No Project/Existing General Plan Alternative would only partially implement the goals and objectives of the proposed project. With this Alternative, fewer commercial/retail and residential uses would be developed when compared to the proposed project. However, additional office/civic/public uses would not be developed. Additionally, area-specific land use regulations and development guidelines for the seven districts would not occur. This Alternative would continue to provide a mix of uses within the Downtown, but not to the extent of the proposed project. Although the No Project/Existing General Plan Alternative would involve development of vacant and underutilized sites with commercial/retail and residential uses, the variety and intensity of uses would not be consistent with the variety and intensity that can be supported by market conditions. This Alternative would not provide a consistent and compatible development to the extent of the proposed project, as specific regulations and guidelines would not be established. Additionally, this Alternative would not provide for a pedestrian friendly environment with attractive storefronts, landscaping and sidewalks, as well as public plazas and
paseos. Therefore, some of the project objectives would not be met, and others would not be met to the same degree as with the proposed project.

7.2 "REDUCED PROJECT" ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Reduced Project Alternative would involve implementation of the proposed project, as described in Section 3.0, Project Description, but at a reduced density for retail, office, residential and civic uses. The Reduced Project Alternative would involve 693,636 s.f. of retail uses, 730,467 s.f. of office/civic/public uses and 2,644 residential units. When compared to the proposed project, this Alternative would result in an overall reduction in development of 25 percent, or approximately 231,212 fewer s.f. of retail uses, 243,489 fewer s.f. of office/civic/public uses and 881 fewer residential units at buildout.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Land Use and Relevant Planning

The Reduced Project Alternative would develop a similar mix of land uses as compared to the proposed project, but would be at a reduced density for the retail, office, residential and civic uses. As with the proposed project, this Alternative would require a General Plan Amendment to change the existing land use designations from Commercial, Light Industrial, Public, Urban Residential and Medium Density Residential to Downtown Lancaster Specific Plan. Additionally, this Alternative would require a Zone Change from the existing zoning (Central Business District, General Commercial, Commercial Planned Development, Office Professional, Public, High-Density Residential and Low-Density Residential (R-7000)) to Downtown Lancaster Specific Plan. This Alternative would also be consistent with the goals and policies of the General Plan and Redevelopment Plan. As both the proposed project and this Alternative would not result in significant and unavoidable land use impacts, the Reduced Project Alternative would be considered neither environmentally inferior nor superior to the proposed project in this regard.

Aesthetics/Light and Glare

The Reduced Project Alternative would alter existing views of and across the project area from off-site vantage points, similar to the proposed project. Aesthetic improvements, such as development consistent with design regulations and design guidelines, public plazas and paseos, and pedestrian walkways in the Downtown would occur with this Alternative. The Reduced Project Alternative would introduce new sources of light and glare to the project area, but to a lesser degree than the proposed project. As with the proposed project, potential light and glare impacts would be minimized through the City’s discretionary review process, approval of development proposals and implementation of mitigation measures. The short-term impacts associated with construction activities would be slightly reduced under this Alternative, as it would result in less intensity of construction activities and associated equipment, and possibly a reduced construction schedule. The Reduced Project Alternative would be considered environmentally superior to the proposed project in this regard.
Traffic, Circulation and Parking

The Reduced Project Alternative would result in approximately 8,926 fewer average daily trips when compared to the proposed project. As noted in Section 5.3, Traffic and Circulation, the proposed project is forecast to generate approximately 35,704 additional daily trips. This Alternative would reduce the significant and unavoidable traffic impacts that would occur with the proposed project. However, similar to the proposed project, no feasible mitigation measures have been identified that would reduce or eliminate all the traffic impacts to a level considered less than significant. This Alternative would be considered environmentally superior to the proposed project in this regard, as overall traffic and circulation impacts would be reduced. This Alternative would require fewer parking spaces than the proposed project. In addition to parking required in each district for proposed land uses, the Reduced Project Alternative would be required to replace any off-street parking spaces displaced by the development, similar to the proposed project. The Reduced Project Alternative would be considered environmentally superior to the proposed project.

Air Quality

The total square footage of development under this Alternative would be less than the proposed project and, therefore, emissions from building activities would be slightly less on a daily basis. However, similar to the proposed project, the potential exists that ambient air quality standards for O₃, PM₁₀, and PM₂.₅ may be exceeded. Construction related air quality impacts would be significant and unavoidable with this Alternative. Although long-term operational emissions would be reduced due to fewer vehicular trips, the Reduced Project Alternative would result in a significant and unavoidable impact. This Alternative would not be consistent with the regional air quality plan. Thus, the Reduced Project Alternative would be considered neither environmentally superior nor inferior to the proposed project.

Noise

The Reduced Project Alternative would develop uses at a lower intensity than compared to the proposed project. The short-term impacts associated with construction activities would be reduced under this Alternative, as it would result in less construction activities and associated equipment. However, similar to the proposed project, construction noise impacts would be significant and unavoidable. When compared to the proposed project, noise levels would decrease due to less vehicular traffic. Although this Alternative would result in less traffic than the proposed project, noise levels would be significant and unavoidable. Noise impacts from other operational sources (e.g., mechanical equipment) would be similar to the project and, as with the project, would be less than significant. Noise impacts would be considered neither environmentally superior nor inferior to the proposed project in this regard.

Population and Housing

This Alternative, with fewer residential units and the reduction of retail, office and civic uses, would result in a reduction of population and housing growth when compared to the proposed project. As noted in Section 5.6, Population and Housing, the proposed project could result in a direct increase to the City’s population of approximately 7,864 persons (approximately 6,775 persons from additional housing and 1,089 persons potentially relocating to the City to fill new positions). The Reduced Project Alternative would involve a 25 percent reduction in retail,
office, civic and residential uses, resulting in a comparative reduction in population growth when compared to the proposed project. Similar to the proposed project, the potential population growth would be consistent with SCAG’s projected 2030 population. Therefore, the Reduced Project Alternative would be considered neither environmentally superior nor inferior to the proposed project in this regard.

**Public Services and Utilities**

This Alternative, with fewer residential units and the reduction of retail, office and civic uses, would result in a slight reduction in affects to fire and police protection services, schools, libraries and parks and recreational facilities when compared to the proposed project. Additionally, the reduction in development with this Alternative would result in less demand for water and reduced wastewater and solid waste generation when compared to the proposed project. However, similar to the proposed project, the availability of adequate water supply cannot be guaranteed and the increase in population would contribute to existing library deficiencies, resulting in significant and unavoidable impacts. Therefore, the Reduced Project Alternative would be considered neither environmentally superior nor inferior to the proposed project in this regard.

**Cultural Resources**

Similar to the proposed project, this Alternative could result in direct or indirect impacts to cultural resources related to a substantial adverse change in the significance of a historical resource. Compliance with identified mitigation measures would reduce the potential impacts to a less than significant level. With this Alternative, the potential disturbance or destruction of undocumented archaeological and/or paleontological resources could occur; however, compliance with Public Resources Code Sections 5097.98 and 5097.99 would reduce impacts to a less than significant level. The Reduced Project Alternative would be considered neither environmentally inferior nor superior to the proposed project in this regard.

**Hazards and Hazardous Materials**

Under this Alternative, impacts related to hazards and hazardous materials would not substantially change relative to the proposed project, as commercial and retail/restaurant uses that use, store, handle, and dispose of very limited, if any, quantities of hazardous materials and wastes would be developed. As with the proposed project, removal of buildings may occur with this Alternative, requiring removal and disposal of potentially hazardous materials. Emergency response and evacuation plan impacts would be comparable to those of the proposed project. As such, this Alternative would be considered neither environmentally superior nor inferior to the proposed project in this regard.

**Hydrology and Water Quality**

With this Alternative, the short-term impacts on water quality associated with grading, excavation, and construction activities in the project area would be similar to those of the proposed project. As with the proposed project, the existing quality and quantity of storm water and urban runoff would be impacted with this alternative, as existing vacant land would be developed. Similar to the proposed project, drainage improvements would be required with implementation of the Reduced Project Alternative. As such, this Alternative would be considered neither environmentally superior nor inferior to the proposed project in this regard.
ABILITY TO MEET THE PROJECT’S OBJECTIVES

The Reduced Project Alternative would only partially implement the goals and objectives of the proposed project. Under this Alternative, new retail, office, residential and civic uses would be developed on vacant and underutilized sites. However, development of this Alternative would provide fewer residential units and fewer retail, office and civic uses when compared to the proposed project. Similar to the proposed project, area-specific land use regulations and development guidelines for the seven districts would occur with this Alternative. This Alternative would encourage activity in the Downtown into the evening; provide consistent and compatible development within the Downtown through the establishment of specifications, regulations and guidelines; and providing a pedestrian friendly environment with attractive storefronts, landscaping and sidewalks, as well as public plazas and paseos. However, in comparison to the proposed project, the intensity of residential, retail, office and civic uses that would occur with the Reduced Project Alternative would be less than what would be supported by market conditions. Therefore, this Alternative would not be consistent with the identified objective to develop the project area at an intensity that can be supported by market conditions. Although a majority of the project objectives identified Section 3.4, Project Goals and Objectives, would be met under the Reduced Project Alternative, none of these goals would be met to the same degree as with the proposed project.

7.3 “ENVIRONMENTAL SUPERIOR” ALTERNATIVE

The determination of an environmentally superior alternative is based on the consideration of how the alternative fulfills the project objectives and how the alternative either reduces significant, unavoidable impacts or substantially reduces the impacts to the surrounding environment. In consideration of these factors, the No Project/Existing General Plan Alternative (Existing Conditions) would be the Environmentally Superior Alternative to the proposed project.

CEQA Guidelines Section 15126.6 indicates that, if the “No Project” Alternative is the “Environmentally Superior” Alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Among the other Alternatives assessed in this EIR, the Reduced Project Alternative would result in reduced development and reduced environmental impacts. Impacts to land use, air quality, noise, population and housing, public services and utilities, cultural resources, hazards and hazardous materials and hydrology and water quality would be similar to the proposed project. Aesthetics/light and glare and traffic, circulation and parking, impacts would be reduced. Although impacts to traffic, air quality and noise would be significant and unavoidable, the impacts would incrementally be reduced based upon the reduction in development. When compared to the proposed project, the Reduced Project Alternative would be environmentally superior and would fulfill the majority of the project objectives.
### Table 7-1
Comparison of Alternatives

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<th>Reduced Project</th>
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<td>Hydrology and Water Quality</td>
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▲ Indicates an impact that is greater than the proposed projects (environmentally inferior).
◇ Indicates an impact that is less than the proposed projects (environmentally superior).
= Indicates an impact that is equal to the proposed projects (neither environmentally superior nor inferior).