

6. Alternatives

The California Environmental Quality Act (Public Resources Code, Section 21000 et seq.; CEQA) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.) require that an EIR “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (PRC Section 21100; CEQA Guidelines Sections 15126(d), 15126.6). If mitigation measures or a feasible project alternative that would meet most of the basic project objectives would substantially lessen the significant environmental effects of a proposed project, the lead agency should not approve the proposed project unless it determines that specific technological, economic, social, or other considerations make the mitigation measures and the project alternative infeasible (PRC Section 21002, CEQA Guidelines Section 15091(a)(3)). The EIR must also identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and should briefly explain the reasons underlying the lead agency’s determination (CEQA Guidelines Section 15126.6(c)).

As explained in Chapter 3, Project Description, this EIR considers a “range of reasonable alternatives” throughout the document, in the form of the four scenarios. The four scenarios test different possible approaches to achieving the City’s objectives for the Comprehensive Plan Update as well as different approaches to avoid or lessen the significant effects of various land use changes, transportation investments, and growth management strategies the Comprehensive Plan Update may allow. Going beyond what is required, the scenarios are analyzed at an equal level of detail.

6.1 ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines Section 15126.6 states that “[a]n 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. An EIR is not required to consider alternatives which are infeasible.”

There are clearly other scenarios that could have been included to manage growth differently or to test other concepts, but the range of scenarios analyzed in this EIR was deliberately selected to test ideas generated during public workshops in 2014 and the EIR scoping process. Other conceivable alternatives may be feasible, including other approaches to grouping the land use and transportation concepts within each scenario, yet there is unlikely to be a feasible alternative that would eliminate the significant impacts identified in Chapter 4.

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For example, during the Comprehensive Plan Update process, some members of the community called for Palo Alto to stop residential and/or non-residential growth altogether. It would be infeasible and illegal for the City to stop residential growth completely since doing so would violate State housing laws that require local governments to participate in “accommodat[ing] the housing needs of Californians of all economic levels” (California Government Code Section 65580 et. seq.). In terms of job growth, while the City could conceivably prevent development of additional non-residential square footage, it would be very difficult to stop employers from adding new employees to existing buildings, and such a moratorium would create intense demand for office space in Palo Alto, increasing commercial rents and creating pressure for non-residential uses such as retail/service business and lower-rent office uses to convert to high-rent tech-based office and R&D uses. Moreover, even if Palo Alto was to put measures in place to stop growth completely, the surrounding region would continue to grow, and as a result many of the impacts identified in this EIR, including impacts to air quality, long-term greenhouse gas emissions, and intersection or freeway ramp level of service, would still occur. In fact, some impacts could potentially be worsened if housing growth was displaced outside of Palo Alto and an even higher proportion of workers had to commute into the City. Therefore, a “no growth” alternative would not avoid the impacts identified under one or more of the four scenarios. For these reasons, a pure “no growth” alternative was rejected from further consideration in favor of two slow growth scenarios (Scenarios 2 and 3). Scenario 1 represents a “Business as Usual” scenario that approximates what is expected to occur if the Comp Plan is not updated and the proposed Plan is not adopted. Scenario 1 represents the “no project alternative” required by CEQA Guidelines Section 15126.6(e).

6.2 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed Project and the alternatives, Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets Project objectives. The proposed Project under consideration cannot be identified as the Environmentally Superior Alternative.

The significant impacts of one or more of the four scenarios that the environmentally superior alternative would be seeking to mitigate are listed in Sections 6.2.1 and 6.2.2 below:

6.2.1 IMPACTS LESS THAN SIGNIFICANT WITH MITIGATION

- AES-1: Implementation of the proposed Plan would have the potential to substantially degrade the existing visual character or quality of the area and its surroundings.
- AES-4: Implementation of the proposed Plan would have the potential to substantially shadow public open space (other than public open streets and adjacent sidewalks) between 9:00 a.m. and 3:00 p.m. from September 21 to March 21.

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- AIR-1: Without inclusion of air quality policies, implementation of the proposed Plan could conflict with or obstruct implementation of the applicable air quality plan.
- AIR-3: Implementation of the proposed Plan would expose sensitive receptors to substantial concentrations of air pollution.
- AIR-4: Implementation of the proposed Plan could create or expose a substantial number of people to objectionable odors unless policies are integrated into the proposed Plan.
- CULT-1: Implementation of the proposed Plan could adversely affect a historic resource listed or eligible for listing on the National and/or California Register, or listed on the City's Historic Inventory.
- CULT-2: Implementation of the proposed Plan could eliminate important examples of major periods of California history or prehistory.
- CULT-3: Implementation of the proposed Plan could damage to an important archaeological resource as defined in Section 15064.5 of the CEQA Guidelines.
- CULT-5: Implementation of the proposed Plan would have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- CULT-6: Implementation of the proposed Plan would directly or indirectly destroy a local cultural resource that is recognized by City Council resolution.
- CULT-7: Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in significant cumulative impacts with respect to cultural resources.
- HYD-2: The proposed Plan could substantially degrade or deplete ground water resources or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.
- LAND-1: The proposed Plan could adversely change the type or intensity of existing or planned land use patterns in the area.
- LAND-2: The proposed Plan would allow development that could be incompatible with adjacent land uses or with the general character of the surrounding area, including density and building height.
- LAND-3: The proposed Plan would allow development that could conflict with established residential, recreational, educational, religious, or scientific uses of an area.
- LAND-4: The proposed Plan would allow new development that could conflict with any applicable City land use plan, policy or regulation (including, but not limited to the Comprehensive Plan, coordinated area plan, or the City's Zoning Ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- LAND-5: The proposed Plan could physically divide an established community.

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- NOISE-1: Implementation of the proposed Plan would have the potential to cause the average 24-hour noise level (L_{dn}) to increase by 5.0 decibels (dB) or more in an existing residential area, even if the L_{dn} would remain below 60 dB.
- NOISE-2: Implementation of the proposed Plan would not cause the L_{dn} to increase by three dB or more in an existing residential area, thereby causing the L_{dn} in the area to exceed 60 dB.
- NOISE-3: Implementation of the proposed Plan would have the potential to cause an increase of three dB or more in an existing residential area where the L_{dn} currently exceeds 60 dB.
- NOISE-4: Implementation of the proposed Plan would have the potential to result in indoor noise levels for residential development to exceed an L_{dn} of 45 dB.
- NOISE-5: Implementation of the proposed Plan would have the potential to expose persons to or generate excessive ground-borne vibration or ground-borne noise levels.
- NOISE-6: Implementation of the proposed Plan would have the potential to expose people to noise levels in excess of established State standards.
- NOISE-7: Implementation of the proposed Plan would have the potential to result in the exposure of persons to or generation of noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies.
- NOISE-8: Implementation of the proposed Plan could result in a potentially substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
- NOISE-11: Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, may result in significant cumulative impacts with respect to noise.
- POP-4: Implementation of the proposed Plan would not create a substantial imbalance between employed residents and jobs.
- PS-7: Implementation of the proposed Plan would result in an adverse physical impact from the construction of additional parks and recreation facilities in order to maintain acceptable performance standards.
- PS-8: Implementation of the proposed Plan would not result in substantial cumulative adverse physical impacts associated with the provision of new or physically altered parks and recreational facilities, need for new or physically altered parks and recreation facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives.
- TRANS-8: Implementation of the project would create the potential demand for through traffic to use local residential streets.
- TRANS-9: Implementation of the project would not create an operational safety hazard.

- UTIL-15: Without the adoption of policies to promote recycling and conservation, the proposed Plan could potentially fall out of compliance with federal, State, and local statutes and regulations related to solid waste.
- UTIL-17: The proposed Plan would not result in a substantial increase in natural gas and electrical service demands that would require the new construction of energy supply facilities and distribution infrastructure or capacity enhancing alterations to existing facilities. However, without the adoption of policies in support of energy efficiency and conservation, the proposed Plan would result in a potentially significant impact, requiring mitigation.

6.2.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

- AIR-2: Implementation of the proposed Plan could violate an air quality standard; contribute substantially to an existing or project air quality violation; and/or result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
- GHG-2: The proposed Plan could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, requiring mitigation.
- GHG-3: The proposed Plan would expose people or structures to the physical effects of climate change, including but not limited to flooding, extreme temperatures, public health, wildfire risk, or other impacts resulting from climate change, requiring mitigation.
- TRANS-1: Implementation of the project would cause an intersection to drop below its motor vehicle level of service standard, or deteriorate operations at representative intersections that already operate at a substandard level of service.
- TRANS-3: Implementation of the project would cause a freeway segment or ramp to drop below its level of service standard, or deteriorate operations that already operate at a substandard level of service.
- TRANS-6: Implementation of the project would impede the operation of a transit system as a result of congestion.

6.2.3 HYBRID ALTERNATIVE

The anticipated Comprehensive Plan Update process, and one of the intended uses of this Draft EIR, is to provide the community and decision makers with an understanding of potential impacts and possible mitigation by describing four planning scenarios that illustrate different ways the City might respond to important issues that Palo Alto is facing. While the Draft EIR is based on these four scenarios, the preferred scenario that is ultimately adopted as the Comprehensive Plan Update is not expected to be identical to any one of them. Instead, the Comprehensive Plan Update is expected to draw from the scenarios and the data and analysis this EIR provides.

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This EIR concludes that:

- Although Scenario 2 has the lowest VMT of the four scenarios because it has the lowest job and housing growth, Scenario 2 also has the highest auto mode share and the fewest trips by transit of the four scenarios because it includes few specific measures to shift trips out of automobiles.
- Grade separation of the Caltrain tracks, as tested in Scenarios 3 and 4, would improve the future level of service at the intersection of Alma Street and Charleston Road from LOS F (without grade separation) to LOS D (with grade separation).
- The sustainability initiatives included in Scenario 4, including policies that promote transit, bicycling, and walking, succeed in achieving the lowest mode share for single-occupant vehicles, the highest mode share for walking, and the most transit trips of the four scenarios. VMT is lower for Scenario 4 than Scenario 1, but not as low as Scenario 2. However, of the four scenarios, Scenario 4 results in five impacted intersections, indicating that the policies to promote alternative modes do not fully mitigate the additional vehicular trips generated by the additional number of housing units and jobs included in this scenario.
- In terms of GHG emissions, Scenario 2 has the lowest total emissions, but Scenario 4 has the lowest per capita emissions, by a slight margin. This again is based on the success of the sustainability initiatives in Scenario 4 in reducing single-occupant vehicle trips, but is also a result of the modeling assumptions and methodology used for the GHG emissions analysis.
- Eliminating housing sites along San Antonio and South El Camino Real and replacing them with higher densities on other sites or new sites along El Camino Real, as considered in Scenarios 3 and 4, would not dramatically alter the impacts of City-wide growth, although there may be differences near the sites in question.

Based on these conclusions, an “environmentally superior alternative” would likely be one that combines the lower or moderate rates of housing and job growth tested in Scenarios 2 and 3 with the sustainability initiatives tested in Scenario 4. The characteristics of this scenario can be further defined by the community and decision makers as they review this Draft EIR and the accompanying Fiscal Study, and as they consider policies and programs for inclusion in the proposed Plan.

At a high level, the “Hybrid Alternative” would have impacts similar to those of the other scenarios analyzed in this EIR. Specifically, the Hybrid Alternative would have aesthetics, land use, and population/housing impacts similar to Scenario 2 if existing housing sites remain in place and stringent citywide growth measures are adopted. Aesthetics, land use, and population/housing impacts would be similar to Scenario 3 if housing sites along San Antonio and South El Camino are eliminated and replaced by higher densities on existing sites closer to transit and services, and if growth control measures are similar to those adopted by the City Council on an interim basis in 2015. These similarities derive from the assumptions regarding the amount and distribution of population, housing, and employment inherent in each scenario, which are the basis of determining land use and aesthetics impacts on a citywide basis. A more refined and site-specific evaluation of land use and aesthetics impacts will be required when specific development is proposed, and

all of the identified impacts related to aesthetics, land use, and population/housing would be mitigated by incorporating appropriate policies and programs in the proposed Plan to guide such development as set forth in the Draft EIR.

The Hybrid Alternative would also have similar impacts to Scenario 2 or 3 in the topic areas of biological resources, cultural resources, geology, hazardous materials, hydrology, public services, and utilities. Again, this is because the amount and distribution of population, housing, and employment are generally determinative of these impacts, which derive from specific developments that will occur over the life of the proposed Plan. A more refined and site-specific evaluation of these topics will be required when specific development is proposed, and all of the identified impacts would be mitigated by incorporating appropriate policies and programs in the proposed Plan to guide such development.

The transportation, air quality, noise, and greenhouse gas emission impacts associated with the Hybrid Alternative could be incrementally better than those identified for Scenario 2 and Scenario 3 because some of the sustainability features included in Scenario 4 would act to reduce traffic (and vehicle miles travelled) associated with these scenarios. (For example, providing free transit passes to residents in transit-accessible areas would encourage the use of transit.) A quantitative analysis using the City's travel demand model would be required to determine the magnitude of the improvement over Scenario 2 or 3, but the improvement would likely be incremental because some of the attributes of Scenario 4, like more dense housing close to transit, that contributed to the performance of Scenario 4 but would not be included to the same extent in the Hybrid Alternative, and because the Hybrid Alternative would include land uses and densities more similar to Scenario 2 or 3. As with all of the other scenarios, proposed mitigation measures could address identified impacts related to transportation, air quality, noise, and greenhouse gas emissions, however some impacts related to transportation, air quality, and greenhouse gas emissions, although reduced, would remain significant even after mitigation measures are applied.

6.3 NEXT STEPS

As explained above, following the publication of this Draft EIR and the accompanying Fiscal Study, community members and decision-makers will have the benefit of data and analysis of the four scenarios to formulate a preferred scenario that will be the basis for the adopted Comprehensive Plan. As part of that process, components of the four scenarios may be mixed and matched, and new components not currently included in any of the scenarios may be introduced. For example, at a joint City Council/General Plan Advisory Committee meeting on January 19, 2015, the City Council unanimously passed a motion requesting that staff supplement this Draft EIR with analysis of a fifth scenario that improves Palo Alto's jobs/housing ratio. This fifth scenario, and others, will be discussed and considered in the months following publication of this Draft EIR.

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