

6. Alternatives

This chapter replaces Chapter 6 contained in the February 2016 Draft EIR. 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 Environmental Impact Report (EIR) “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (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, the February 2016 Draft EIR and this Supplement to the Draft EIR consider a “range of reasonable alternatives” throughout the document, in the form of the six scenarios. The six 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

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each scenario, yet there is unlikely to be a feasible alternative that would eliminate the significant impacts identified in Chapter 4 of the February 2016 Draft EIR and this Supplement to the Draft EIR.

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 and intersection or freeway ramp level of service, would still occur.

Appendix H of this Supplement to the Draft EIR provides a discussion and analysis of a “No Growth Scenario.” This analysis assumes that the proposed Plan is not adopted and that no growth in population, employment, or square footage would occur in Palo Alto by 2030 beyond the amount of development existing in 2014, plus new growth permitted by fall 2016. The No Growth Scenario is purely hypothetical and was developed to highlight the extent to which the proposed Plan’s significant and unavoidable impacts result from regional growth outside of Palo Alto. A “no growth” alternative would not avoid the impacts identified under one or more of the six 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), meaning an updated Comprehensive Plan would not be adopted.

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.

There are not substantial differences in the number or extent of environmental impacts among the six scenarios evaluated in the February 2016 Draft EIR and this Supplement to the Draft EIR. As shown below, the majority of potential impacts could be mitigated to a less-than-significant level under all six scenarios,

and all six would result in the same significant and unavoidable impacts to air quality and transportation. Moreover, these same significant and unavoidable impacts would also occur under the hypothetical No Growth Scenario, demonstrating that the impacts are largely attributable to the cumulative effects of regional development rather than to any one of the six scenarios.

However, there are differences of degree among the six scenarios. Of the six, Scenario 5 would have the fewest environmental impacts. Although all six scenarios would generate a substantial increase in criteria air pollutant emissions, Scenario 5 would result in the lowest total emissions and the lowest per capita emissions. Similarly, although all six scenarios result in unacceptable levels of service at multiple intersections, Scenario 5 would result in impacts at four intersections, while Scenarios 1 and 4 would impact seven intersections. Scenario 5 combines the rigorous sustainability initiatives of Scenarios 4 and 6 with the modest housing growth of Scenario 3 and low job growth of Scenario 6, thereby reducing single-occupant vehicle trips relative to the other scenarios. However, it is important to note that some members of the community or Palo Alto decision makers may have a different perspective in determining which scenario represents the environmentally superior scenario, or may not view these differences of degree as substantial enough to be the basis for selecting a single scenario as the preferred scenario.

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.
- 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.

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- 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.
- 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.
- 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-5: The proposed Plan could physically divide an established community.
- 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.

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- 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.
- 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).
- 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. (The number of impacted intersections in at least one peak hour by scenario would be: Scenario 1, seven intersections; Scenario 2, four intersections; Scenario 3, five intersections; Scenario 4, seven intersections; Scenario 5, four intersections; Scenario 6, six intersections.)

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- 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. (All six scenarios would contribute to impacts on six freeway segments.)
- 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 six planning scenarios that illustrate different ways the City might respond to important issues that Palo Alto is facing. While the February 2016 Draft EIR and this Supplement to the Draft EIR are based on these six 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.

This EIR concludes that:

- Scenario 2 has the highest auto mode share and the fewest trips by transit of the six scenarios because it includes few specific measures to shift trips out of automobiles.
- Grade separation of the Caltrain tracks, as tested in Scenarios 3 through 6, 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 Scenarios 4 through 6, 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 six scenarios. VMT within the EIR Study Area is lower for Scenario 6 than Scenario 1, but not as low as Scenario 5. However, of the six scenarios, both Scenarios 1 and 4 result in seven 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 the scenario.
- In terms of GHG emissions in the EIR Study Area, Scenario 5 has the lowest total emissions and the lowest per capita emissions. This is based on the success of the sustainability initiatives in Scenario 5 in reducing single-occupant vehicle trips and low job growth relative to the other scenarios.
- 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 through 5, would not dramatically alter the impacts of citywide growth, although there may be differences near the sites in question.

Based on these conclusions, a “hybrid alternative” would likely be one that combines the moderate rates of housing growth in Scenarios 3 and 5 with the sustainability initiatives tested in Scenarios 4 through 6. To further meet the City’s desire to increase housing options in the city, the hybrid alternative may also include the new housing sites and higher residential densities along El Camino Real as in Scenario 6, although this could result in additional traffic impacts beyond those identified for Scenario 5. 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. Aesthetics, land use, and population/housing impacts would be similar to Scenarios 3 and 5 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. The Hybrid Alternative would also have similar less-than-significant impacts to Scenario 2, 3, or 5 in the topic areas of biological resources, cultural resources, geology, hazardous materials, hydrology, public services, and utilities.

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 potential impacts related to aesthetics, biological resources, cultural resources, geology, hazardous materials, hydrology, land use, population/housing, public services, and utilities would be mitigated by incorporating appropriate policies and programs in the proposed Plan to guide such development as set forth in this EIR.

The Hybrid Alternative could further reduce the transportation, air quality, noise, and greenhouse gas emission impacts associated with Scenario 3 by incorporating some of the sustainability features included in Scenarios 4 through 6 to reduce traffic and vehicle miles traveled. (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 3. As with all of the other scenarios, proposed mitigation measures could address identified impacts related to transportation, air quality, and noise, however some impacts related to transportation and air quality, although reduced, would remain significant even after mitigation measures are applied.

6.3 NEXT STEPS

Following the publication of this Supplement to the Draft EIR and the accompanying Fiscal Study, community members and decision-makers will have the benefit of data and analysis of the six scenarios to formulate a preferred scenario that will be the basis for the adopted Comprehensive Plan. The Final EIR will describe the preferred scenario and how it aligns with the information and analysis presented in the February 2016 Draft EIR and Supplement to the Draft EIR. Supplemental environmental analysis would only be required if the preferred scenario deviates substantially from the scenarios included in the February 2016 Draft EIR and Supplement to the Draft EIR, or results in unanticipated impacts.

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