
18. ALTERNATIVES EVALUATION OVERVIEW

The potential environmental consequences of the proposed Redwood City Downtown Precise Plan have been analyzed in detail for two identified project buildout (M.A.D.) alternatives: (1) the "Maximum Intensity" scenario and (2) the "Moderate Intensity" scenario. The potential buildout characteristics of these two alternatives are described in EIR section 3.6 (Precise Plan Buildout Alternatives). Precise Plan development capacities ultimately adopted by the City are expected to fall within the range of these two alternatives.

The potential impacts and recommended mitigation measures for each of these two project alternatives have been individually identified throughout the EIR; in several cases, the EIR states that the impact and mitigation findings for a particular environmental issue (e.g., hazards and hazardous materials) apply to both the Maximum Intensity and Moderate Intensity project alternatives.

To provide a basis for further understanding of the environmental effects of the proposed project and possible approaches to reducing identified significant impacts, section 15126.6 of the CEQA Guidelines (Consideration and Discussion of Alternatives to the Proposed Project) requires an EIR to also "...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." Section 15126.6(b) of the CEQA Guidelines states that, because the EIR must identify ways to mitigate or avoid significant effects of the proposed project on the environment, "[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

For ease of comparison in this EIR chapter, each of the two project alternatives (Maximum Intensity and Moderate Intensity) and three additional alternatives (Modified Precise Plan--Reduced Height Alternative, No Project--Existing Land Use Policy [Zoning], and No Project--No Change in Existing Development) are identified as "Alternative 1," "Alternative 2," etc.

Pursuant to CEQA Guidelines section 15126.6, this EIR chapter compares five identified project alternatives, as summarized below:

- **Alternative 1: Precise Plan Maximum Intensity Scenario.** Under the Maximum Intensity alternative, the Precise Plan would facilitate development of up to approximately 3,700 net additional residential units, 600,000 net additional square feet of office floor area, 295,000 net additional square feet of retail floor area, and 200 net additional lodging rooms (e.g. hotel rooms) in the Precise Plan area. Also, the Maximum Intensity alternative would result in a net reduction of approximately 95,000 square feet of industrial floor area.

- **Alternative 2: Precise Plan Moderate Intensity Scenario.** The Moderate Intensity alternative growth increment generally represents two-thirds (66.6 percent) of the Maximum Intensity alternative growth estimates--i.e., a one-third (33.3 percent) reduction in the Precise Plan buildout "cap," with the following exceptions:
 - for some Precise Plan designated "Downtown Core" Use Zones, where ground floor retail is required,¹ retail floor area totals have been adjusted to match ground floor retail footprint limitations; and
 - the same maximum lodging development increment total of 200 rooms has been included in both the Maximum Intensity and Moderate Intensity alternatives because this hotel room increment is considered by the Plan authors to be financially essential for Downtown viability.

Under the Moderate Intensity alternative, the Precise Plan would facilitate development of up to approximately 2,500 net additional residential units, 275,000 net additional square feet of office floor area, 221,000 net additional square feet of retail floor area, and 200 net additional lodging rooms (e.g. hotel rooms) in the Precise Plan area. Similar to the Maximum Intensity alternative, the Moderate Intensity alternative would also result in a net reduction of approximately 95,000 square feet of industrial floor area.

- **Alternative 3: Modified Precise Plan--Reduced Height (9-Story Height Limit).** The City's current zoning ordinance building height limitations for the various existing Downtown zoning districts do not exceed 9 stories. This alternative assumes that the Precise Plan would be revised to keep permissible building heights to the current 9-story maximum; i.e., the currently proposed maximum 12-Story and 10-Story Height Zones would be replaced with a maximum 9-Story Height Zone.
- **Alternative 4: No Project--Existing Land Use Policy (Zoning).** This alternative assumes that a new Downtown Precise Plan would not be adopted, and future development would instead occur to the maximum limits permissible under current Redwood City Strategic General Plan and Redwood City Zoning Ordinance allowances for downtown Redwood City.
- **Alternative 5: No Project--No Change in Existing Development.** This CEQA-required No Project alternative assumes that a new Downtown Precise Plan would not be adopted, and that there would be no change in existing mix of land uses, building coverages, building heights, and other development conditions from what exists now in the Downtown area.

Table 18.1 summarizes the estimated net new development permissible in the Precise Plan area under each of the five identified alternatives.

¹See Table 2.2.1 on page 29 of the September 2006 Draft Precise Plan.

Table 18.1
REDWOOD CITY DOWNTOWN PRECISE PLAN: SUMMARY OF POTENTIAL DEVELOPMENT INCREMENT UNDER THE PROJECT ALTERNATIVES

	Residential (units)	Office (s.f.)	Retail (s.f.)	Lodging (rooms)	Industrial (s.f.)	Civic/Instit. (s.f.)
Maximum Intensity Alternative	3,700	600,000	295,000	200	-95,000	0
Moderate Intensity Alternative	2,500	275,000	221,000	200	-95,000	0
Reduced Height Alternative	3,450	600,000	295,000	200	-95,000	0
No Project Alternative: Existing Land Use Policy (Zoning)	3,300	921,000	275,000	189	-95,000	0
No Project Alternative: No Development	0	0	0	0	0	0

SOURCE: City of Redwood City, Wagstaff and Associates; October 2006.

Alternatives Evaluation Methodology: In the subsections which follow, the five project alternatives are compared to each other for each of the environmental topics (see chapters 5 through 15) evaluated in this EIR.

CEQA Guidelines section 15126.6(d) indicates that the EIR comparison of the impacts of the identified alternatives is intended to be less detailed than the discussion of the impacts of the proposed project.¹ Following that guideline, the discussions in this chapter of the comparative impacts of the three additional identified alternatives are intentionally less detailed than the discussions in EIR chapters 5 through 15 of the significant effects of the two project M.A.D. scenarios (Maximum Intensity and Moderate Intensity).

CEQA Guidelines section 15126.6(d) states, "A matrix displaying the major characteristics may be used to summarize the comparison [of alternatives]." Accordingly, Table 18.1 above and Table 18.2 (Alternatives Comparison: Summary Overview, at the end of this chapter) compare the key project description characteristics of the five identified alternatives; Table 18.2 provides a summary of the various impact conclusions for each alternative, leading to selection of the "environmentally superior" alternative, as called for under CEQA Guidelines section 15126.6(e)(2).

¹CEQA Guidelines section 15126.6(d) states, "If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."

The comparative summary evaluation information in Table 18.2 is further discussed in subsections 18.1 through 18.5 which follow. These subsections provide a narrative comparison of each of the five identified alternatives, including the principal characteristics and comparative mitigating and adverse effects of each. Section 18.6 describes the environmental comparison conclusions. As required by CEQA, section 18.6 identifies and explains the "environmentally superior" alternative.

18.1 ALTERNATIVE 1: PRECISE PLAN MAXIMUM INTENSITY SCENARIO

18.1.1 Principal Characteristics

The Maximum Intensity project alternative is described in section 3.6 (Precise Plan Buildout Alternatives), and evaluated throughout the remaining chapters, of this EIR. As shown in Table 18.1, under this project alternative, the Precise Plan would facilitate up to an estimated 3,700 net additional residential units, approximately 600,000 net additional square feet of office floor area, about 295,000 net additional square feet of retail floor area, and up to 200 net additional lodging rooms (e.g., hotel rooms) *over existing conditions in the Precise Plan area*. Also, the Maximum Intensity alternative would result in a *net reduction* of about 95,000 square feet of industrial floor area.

18.1.2 Alternative 1 Evaluation: Comparative Adverse and Mitigating Effects

(a) Land Use and Planning. The Maximum Intensity alternative would not result in any significant adverse land use or planning impacts. Future buildout characteristics under the Precise Plan established development regulations described in chapter 3 (Project Description) of this EIR would improve Downtown land use relationships. The Precise Plan stipulates that Downtown housing and mixed use (commercial/housing) development be conveniently located near public transportation, shopping, employment, recreation, and other community facilities. Implementation of this Precise Plan policy and associated development regulations would result in *beneficial land use effects*.

(b) Population and Housing. With a projected net population increase of approximately 8,140 residents in 3,700 new multifamily residential units (2.2 persons average per unit) in downtown Redwood City, the Maximum Intensity alternative would result in significant unavoidable impacts related to transportation and circulation and long-term regional air emissions, all of which are described in their own chapters in the EIR. This alternative would also have a *beneficial effect* by assisting Redwood City in achieving a better citywide balance between employed residents and jobs, more housing concentration in the Downtown, and an associated decrease in current in-commuting trends.

(c) Aesthetics and Visual Resources. Based on CEQA criteria, Precise Plan-proposed new development at densities and heights greater than currently existing in downtown Redwood City would result in potentially significant aesthetic and visual resources impacts under the Maximum Intensity alternative, all of which would be reduced to less-than-significant levels by implementing the measures described in chapter 7 of this EIR. Implementation of the Precise Plan development regulations and design standards would also result in substantial *beneficial effects* on the Downtown visual environment (e.g., improved overall visual form, identity and image; improved compatibilities with internal significant buildings and surrounding residential

areas; improved compatibility of architectural styles; improved streetscapes; improved public areas; etc.).

(d) Cultural and Historic Resources. This alternative would result in potentially significant impacts on cultural and historic resources, all of which could be mitigated to less-than-significant levels by implementing the measures described in chapter 8 of this EIR. Based on CEQA and recent case law, individual future developments affecting historic resources may require additional CEQA review.

(e) Transportation and Circulation. The comparative trip generation characteristics of each alternative are identified in Table 18.2. The Maximum Intensity alternative would result in significant unavoidable transportation and circulation impacts according to CEQA criteria, primarily due to the project-generated net increase of approximately 1,649 vehicular trips in the AM peak hour and 1,910 vehicular trips in the PM peak hour. However, the Precise Plan also proposes high-density, mixed land use patterns that promote walking, transit use, and shorter commutes, as well as Downtown improvements to help ensure that "pedestrian comfort, safety, convenience, and enjoyment have priority" (Precise Plan, Book I, Section 1.2--"Building the Vision").

(f) Public Services, Utilities, and Infrastructure. This alternative would result in potentially significant, but mitigable, impacts on public services, utilities, and infrastructure, as described in chapter 10 of this EIR. The Precise Plan proposes improvements to the Downtown public space network which would represent a *beneficial effect* of Plan implementation.

(g) Noise. The Maximum Intensity alternative would result in potentially significant demolition/construction period noise and vibration impacts, as well as potential exposure of new, Precise Plan-facilitated noise-sensitive development (e.g., residences) to noise levels exceeding City noise standards. These noise impacts would be reduced to less-than-significant levels by implementing the measures described in chapter 11 of this EIR.

(h) Air Quality. This alternative would result in potentially significant air quality impacts related to construction-period emissions and long-term regional emissions increases. The construction emissions would be reduced to a less-than-significant level with implementation of the mitigation described in chapter 12 of this EIR. Long-term emissions, however, would remain significant and unavoidable even with implementation of EIR-identified mitigation, primarily due to the project-generated net increase in daily vehicular trips generated. The Precise Plan proposes high-density, mixed land use patterns that promote walking, transit use, and shorter commutes, which would help reduce long-term regional air emissions, but not to a less-than-significant level.

(i) Hazards and Hazardous Materials. No potentially significant hazards or hazardous materials impact would result from implementation of the Maximum Intensity alternative.

(j) Biological Resources. This alternative would result in potentially significant biological resource impacts (i.e., potential loss of heritage trees, special-status species, and jurisdictional wetlands), all of which would be mitigated to less-than-significant levels with implementation of the measures included in chapter 14 of this EIR.

Table 18.2
 TRIP GENERATION COMPARISON--PROJECT ALTERNATIVES

Alternative	New Trips					
	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Alternative 1: Maximum Intensity Precise Plan						
Residential	168	909	1,077	720	389	1,109
Office	762	102	864	126	681	807
Retail	90	58	148	287	310	542
Lodging	32	21	59	18	15	23
Industrial	(77)	(10)	(87)	(11)	(82)	(93)
Subtotal	975	1,086	2,061	1,105	1,283	2,388
Mixed Use Reduction (20%)						
Total Net New Trips	780	869	1,649	884	1,026	1,910
Alternative 2: Moderate Intensity Precise Plan						
Residential	118	613	731	482	263	745
Office	349	44	393	54	307	361
Retail	68	43	111	194	211	405
Lodging ¹	34	29	63	15	21	(36)
Industrial	(77)	(10)	(87)	(11)	(82)	(93)
Subtotal	492	719	1,211	734	720	1,454
Mixed Use Reduction (20%)						
Total Net New Trips	394	575	969	587	576	1,163
Alternative 3: Reduced Building Height Precise Plan						
Residential	157	848	1,005	671	363	1,034
Office	762	102	864	126	681	807
Retail	90	58	148	287	310	542
Lodging	32	21	59	18	18	23
Industrial	(77)	(10)	(87)	(11)	(82)	(93)
Subtotal	964	1,025	1,988	1,056	1,257	2,313
Mixed Use Reduction (20%)						
Total Net New Trips	771	820	1,590	845	821	1,850
Alternative 4: Buildout Under Existing Zoning						
Residential	145	810	959	641	271	982
Office	1,186	160	1,347	208	1,076	1,272
Retail	90	58	147	259	280	527
Lodging	33	21	60	11	15	21
Industrial	(77)	(10)	(87)	(11)	(82)	(93)
Subtotal	1,377	1,039	2,426	1,108	1,560	2,709
Mixed Use Reduction (20%)						
Total Net New Trips	1,012	831	1,941	886	1,248	2,167

¹Figures differ from Alternative 1 because, although number of rooms is the same (200), trip reductions due to lodging/retail mix vary.

(k) Geology and Soils. This alternative would result in potentially significant impacts related to seismic and soil erosion/sedimentation concerns, all of which would be mitigated to less-than-significant levels with implementation of the measures included in chapter 15 of this EIR.

(l) Project Consistency With Local and Regional Plans. The Maximum Intensity alternative is considered substantially consistent with local and regional plans, including the Redwood City Strategic General Plan, San Carlos Airport Land Use Plan, Association of Bay Area Governments (ABAG) Land Use Policy Framework, ABAG housing and population projections, the City's adopted Urban Water Management Plan, and the Bay Area Air Quality Management District (BAAQMD) *Bay Area 2005 Ozone Strategy*.

(m) Attainment of City's Project Objectives and Goals. This alternative would fully attain the City's project objectives and goals as identified in section 3.3 (Basic Project Objectives and Goals) of this EIR.

18.2 ALTERNATIVE 2: PRECISE PLAN MODERATE INTENSITY SCENARIO

18.2.1 Principal Characteristics

The Moderate Intensity alternative is described in section 3.6 (Precise Plan Buildout Alternatives), and evaluated throughout the remaining chapters, of this EIR. As indicated in Table 18.1, under this alternative, the Precise Plan would facilitate up to an estimated 2,500 net additional residential units, approximately 275,000 net additional square feet of office floor area, about 221,000 net additional square feet of retail floor area, and up to 200 net additional lodging rooms (e.g., hotel rooms) *over existing conditions in the Precise Plan area*. Similar to the Maximum Intensity alternative, the Moderate Intensity alternative would result in a *net reduction* of about 95,000 square feet of industrial floor area.

The Moderate Intensity alternative assumes that, compared to the Maximum Intensity alternative, the overall M.A.D. "caps" for the entire Precise Plan area would be lower and individual sites would be developed at lower residential densities (e.g., dwelling units per acre) and commercial intensities (e.g., floor area ratios). This alternative *does not assume* that development would be permitted on fewer sites or at less intensity on individual sites as compared to the Maximum Intensity alternative; only that the cumulative development total or "cap" would be lower. Therefore, potential overall traffic generation, associated air quality and noise impacts, and overall wastewater, water and other municipal service needs would be lower, but potential site-specific impacts associated with future individual developments (e.g., potential impacts on historic structures, potential loss of biological resources, potential geotechnical impacts) would not be substantially reduced under the Moderate Intensity alternative because the basic site grading, disturbance, or coverage resulting from individual development projects would not necessarily be reduced. In such cases, similar impacts would result from, and similar mitigations would be applied to, each future site-specific development regardless of the overall "cap" placed on total Downtown development.

18.2.2 Alternative 2 Evaluation: Comparative Adverse and Mitigating Effects

(a) Land Use and Planning. The Moderate Intensity alternative would not result in any significant adverse land use or planning impacts. Future buildout characteristics under the

Precise Plan established development regulations described in chapter 3 (Project Description) of this EIR would improve Downtown land use relationships. The Precise Plan stipulates that Downtown housing and mixed use (commercial/housing) development be conveniently located near public transportation, shopping, employment, recreation, and other community facilities. Implementation of this Precise Plan policy and associated development regulations would result in *beneficial land use effects*.

(b) Population and Housing. With a projected net population increase of approximately 5,500 residents in 2,500 new multifamily residential units (2.2 persons average per unit) in downtown Redwood City, the Moderate Intensity alternative would result in reduced, but still significant unavoidable, impacts related to transportation and circulation and long-term regional air emissions compared to the Maximum Intensity alternative, all of which are described in their own chapters in the EIR. Similar to the Maximum Intensity alternative, the Moderate Intensity alternative would also have a *beneficial effect* by assisting Redwood City in achieving a better citywide balance between employed residents and jobs, more housing concentration in the Downtown area, and an associated decrease in the current in-commuting trend.

(c) Aesthetics and Visual Resources. Similar to the Maximum Intensity alternative, Precise Plan-proposed new development at densities and heights greater than currently existing in downtown Redwood City would result in reduced, but still potentially significant, aesthetic and visual resources impacts under the Moderate Intensity alternative, all of which would be reduced to less-than-significant levels by implementing the measures described in chapter 7 of this EIR. Implementation of the Precise Plan development regulations and extensive design standards would also result in substantial *beneficial effects* on the Downtown visual environment (e.g., improved overall visual form, identity and image; improved compatibilities with internal significant buildings and surrounding residential areas; improved compatibility of architectural styles; improved streetscapes; improved public areas; etc.).

(d) Cultural and Historic Resources. Similar to the Maximum Intensity alternative, this project scenario would result in potentially significant impacts on cultural and historic resources, all of which could be mitigated to less-than-significant levels by implementing the measures described in chapter 8 of this EIR. Based on CEQA and recent case law, individual future developments affecting historic resources may require additional CEQA review.

(e) Transportation and Circulation. The comparative trip generation characteristics of each alternative are identified in Table 18.2. Compared to the Maximum Intensity alternative, the Moderate Intensity alternative would result in reduced, but still significant unavoidable, transportation and circulation impacts according to CEQA criteria, primarily due to the project-generated net increase of approximately 969 vehicular trips in the AM peak hour and 1,163 vehicular trips in the PM peak hour. However, the Precise Plan also proposes high-density, mixed land use patterns that promote walking, transit use, and shorter commutes, as well as Downtown improvements to help ensure that "pedestrian comfort, safety, convenience, and enjoyment have priority" (Precise Plan, Book I, Section 1.2--"Building the Vision").

(f) Public Services, Utilities, and Infrastructure. Compared to the Maximum Intensity alternative, this alternative would result in reduced, but still potentially significant, impacts on public services, utilities, and infrastructure, all of which would be reduced to less-than-significant levels by implementing the measures described in chapter 10 of this EIR. The Precise Plan proposes improvements to the Downtown public space network which would represent a *beneficial effect* of Plan implementation.

(g) Noise. Compared to the Maximum Intensity alternative, the Moderate Intensity alternative would result in reduced, but still potentially significant, demolition/construction period noise and vibration impacts, as well as potential exposure of new, Precise Plan-facilitated noise-sensitive development (e.g., residences) to noise levels exceeding City noise standards. These noise impacts would be reduced to less-than-significant levels by implementing the measures described in chapter 11 of this EIR.

(h) Air Quality. Compared to the Maximum Intensity alternative, this alternative would result in reduced, but still potentially significant, air quality impacts related to construction-period emissions and long-term regional emissions increases. The construction emissions would be reduced to a less-than-significant level with implementation of the mitigation described in chapter 12 of this EIR. Long-term emissions, however, would remain significant and unavoidable even with implementation of EIR-identified mitigation, primarily due to the project-generated net increase of daily vehicular trips generated by this alternative (even though this alternative would generate approximately 40 percent fewer additional daily vehicular trips than would the Maximum Intensity scenario). The Precise Plan proposes high-density, mixed land use patterns that promote walking, transit use, and shorter commutes, which would help reduce long-term regional air emissions, but not to a less-than-significant level.

(i) Hazards and Hazardous Materials. Similar to the other alternatives, no potentially significant hazards or hazardous materials impact would result from implementation of the Moderate Intensity alternative.

(j) Biological Resources. Similar to the Maximum Intensity alternative, this alternative would result in potentially significant biological resource impacts (i.e., potential loss of heritage trees, special-status species, and jurisdictional wetlands), all of which would be mitigated to less-than-significant levels with implementation of the measures included in chapter 14 of this EIR.

(k) Geology and Soils. Compared to the Maximum Intensity alternative, the Moderate Intensity alternative would result in reduced, but still potentially significant, impacts related to seismic and soil erosion/sedimentation concerns, all of which would be mitigated to less-than-significant levels with implementation of the measures included in chapter 15 of this EIR.

(l) Project Consistency With Local and Regional Plans. The Moderate Intensity alternative is considered substantially consistent with local and regional plans, including the Redwood City Strategic General Plan, San Carlos Airport Land Use Plan, Association of Bay Area Governments (ABAG) Land Use Policy Framework, ABAG housing and population projections, the City's adopted Urban Water Management Plan, and the Bay Area Air Quality Management District (BAAQMD) *Bay Area 2005 Ozone Strategy*.

(m) Attainment of City's Project Objectives and Goals. This alternative would be less effective in fully attaining the City's project objectives and goals as identified in section 3.3 (Basic Project Objectives and Goals) of this EIR.

18.3 ALTERNATIVE 3: MODIFIED PRECISE PLAN--REDUCED HEIGHT (9-STORY HEIGHT LIMIT)

18.3.1 Principal Characteristics

The Reduced Height alternative assumes that the Precise Plan-proposed maximum 12-Story and 10-Story Height Zones would be reduced to a maximum 9-Story Height Zone, which is the maximum Downtown height limit permitted by current Redwood City zoning; all other Precise Plan policies and development regulations would remain in place. Generally, the Precise Plan proposes 12-Story and 10-Story Height Zones at Sequoia Station and along Middlefield Road and Jefferson Street (see Figure 7.3 in chapter 7 herein). These particular Height Zones would each be revised to 9 stories under this alternative.

The Reduced Height alternative assumes an associated incremental reduction in Precise Plan area residential development potential from approximately 3,700 multifamily units (under the Maximum Intensity alternative) to about 3,450 units, or a reduction of 250 multifamily units (see Table 18.1). Generally, this assumption is based on the Plan's identifying the upper floors of mixed use development in the 12-Story and 10-Story Height Zones for residential development. The affected height zones do not include office designations, and the change in number of upper stories would not affect ground-floor retail footprints. Therefore, all other site-specific incremental development potentials (office, retail, lodging) in the affected height zones, as well as all other residential, office, retail and lodging development outside of the affected height zones, would remain as described for the Maximum Intensity alternative.

Under this Reduced Height alternative, the same Precise Plan opportunity areas would be developed with the same potential building "footprints" as the Maximum Intensity alternative. Therefore, potential impacts associated with future individual site modifications (e.g., potential construction period dust impacts, potential loss of biological resources, potential geotechnical impacts) would not be substantially reduced under the Reduced Height alternative because the basic site grading, disturbance, or coverage resulting from individual development projects would not necessarily be reduced. In such cases, similar impacts would result from, and similar mitigations would be applied to, each future site-specific development regardless of the height of the future structures on the site.

18.3.2 Alternative 3 Evaluation: Comparative Adverse and Mitigating Effects

(a) Land Use and Planning. The Reduced Height alternative would not result in any significant added adverse land use or planning impacts. Future buildout characteristics under the numerous non-height-related Precise Plan development regulations described in chapter 3 (Project Description) of this EIR would still improve Downtown land use relationships. The Precise Plan stipulates that Downtown housing and mixed use (commercial/housing) development be conveniently located near public transportation, shopping, employment, recreation, and other community facilities. The reduced building height limitations would reduce potentials for realization of this Precise Plan goal and associated beneficial land use effects.

(b) Population and Housing. With a projected net population increase of approximately 7,600 residents in 3,450 new multifamily residential units (2.2 persons average per unit) in downtown Redwood City, the Reduced Height alternative would result in reduced, but still significant unavoidable, impacts related to transportation and circulation and long-term regional air emissions. In comparison to the Maximum Intensity alternative, the Reduced Height alternative

would have a reduced *beneficial effect* in assisting Redwood City with achievement of a better citywide balance between employed residents and jobs, and associated decreases in the current in-commuting trend.

(c) Aesthetics and Visual Resources. Compared to the maximum 12-Story and 10-Story Height Zones proposed under the Maximum Intensity and Moderate Intensity alternatives, the Reduced Height (9-story height limit) alternative would result in reduced, but still potentially significant, aesthetic and visual resources impacts, all of which would be reduced to less-than-significant levels by implementing the measures described in chapter 7 of this EIR. Implementation of the extensive other Precise Plan development regulations and actions would still result in *beneficial effects* on the Downtown visual environment.

(d) Cultural and Historic Resources. This Reduced Height alternative would result in the same potentially significant impacts on cultural and historic resources as the Maximum and Moderate Intensity alternatives, all of which could be mitigated to less-than-significant levels by implementing the measures described in chapter 8 of this EIR. Based on CEQA and recent case law, individual future developments affecting historic resources may require additional CEQA review.

(e) Transportation and Circulation. The comparative trip generation characteristics of each alternative are identified in Table 18.2. Compared to the Maximum Intensity alternative, the Reduced Height alternative would result in reduced, but still significant unavoidable, transportation and circulation impacts according to CEQA criteria, primarily due to the project-generated net increase of approximately 1,590 vehicular trips in the AM peak hour and 1,850 vehicular trips in the PM peak hour. However, the Precise Plan also proposes high-density, mixed land use patterns that promote walking, transit use, and shorter commutes, as well as Downtown improvements to help ensure that pedestrian comfort, safety, convenience, and enjoyment have priority (Precise Plan, Book I, Section 1.2B Building the Vision).

(f) Public Services, Utilities, and Infrastructure. Compared to the Maximum Intensity alternative, this alternative would result in reduced, but still potentially significant, impacts on public services, utilities, and infrastructure, all of which would be reduced to less-than-significant levels by implementing the measures described in chapter 10 of this EIR. The Precise Plan proposes improvements to the Downtown public space network which would still represent a *beneficial effect* of Plan implementation.

(g) Noise. Compared to the Maximum Intensity alternative, the Reduced Height alternative would result in reduced, but still potentially significant, demolition/construction period noise and vibration impacts, as well as potential exposure of new, Precise Plan-facilitated noise-sensitive development (e.g., residences) to noise levels exceeding City noise standards. These noise impacts would be reduced to less-than-significant levels by implementing the measures described in chapter 11 of this EIR.

(h) Air Quality. Compared to the Maximum Intensity alternative, this alternative would result in reduced, but still potentially significant, air quality impacts related to construction-period emissions and long-term regional emissions increases. The construction emissions would be reduced to a less-than-significant level with implementation of the mitigation described in chapter 12 of this EIR. Long-term emissions, however, would remain significant and unavoidable even with implementation of EIR-identified mitigation, primarily due to the net increase in daily vehicular trips generated by this alternative (even though this alternative would

generate approximately 3.3 percent fewer daily vehicular trips than would the Maximum Intensity alternative). The Precise Plan proposes high-density, mixed land use patterns that promote walking, transit use, and shorter commutes, which would help reduce long-term regional air emissions, but not to a less-than-significant level.

(i) Hazards and Hazardous Materials. Similar to the other alternatives, no potentially significant hazards or hazardous materials impact would result from implementation of the Reduced Height alternative.

(j) Biological Resources. This Reduced Height alternative would result in potentially significant biological resource impacts similar to the Maximum and Moderate Intensity alternatives (i.e., potential loss of heritage trees, special-status species, and jurisdictional wetlands), all of which would be mitigated to less-than-significant levels with implementation of the measures included in chapter 14 of this EIR.

(k) Geology and Soils. The Reduced Height alternative would result in reduced, but still potentially significant, impacts related to seismic and soil erosion/sedimentation concerns, all of which would be mitigated to less-than-significant levels with implementation of the measures included in chapter 15 of this EIR.

(l) Project Consistency With Local and Regional Plans. Because it would maintain existing adopted height limits, the Reduced Height alternative is considered more consistent with local and regional plans, including the Redwood City Strategic General Plan and San Carlos Airport Land Use Plan, and would also be substantially consistent with the Association of Bay Area Governments (ABAG) Land Use Policy Framework, ABAG housing and population projections, the City's adopted Urban Water Management Plan, and the Bay Area Air Quality Management District (BAAQMD) *Bay Area 2005 Ozone Strategy*.

(m) Attainment of City's Project Objectives and Goals. This Reduced Height alternative would be less effective in fully attaining the City's project objectives and goals as identified in section 3.3 (Basic Project Objectives and Goals) of this EIR.

18.4 ALTERNATIVE 4: NO PROJECT--EXISTING LAND USE POLICY (ZONING)

18.4.1 Principal Characteristics

This alternative reflects the Redwood City Strategic General Plan and Redwood City Zoning Ordinance allowances in downtown Redwood City (i.e., there would be no change in current land use and zoning controls for the Downtown), as described in section 5.2 (Land Use and Planning--Pertinent Plans and Policies) of this EIR. As shown in Table 18.1, under this alternative, development in the Precise Plan area could include up to approximately 3,300 net additional residential units, 921,000 net additional square feet of office floor area, 275,000 net additional square feet of retail floor area, and 189 net additional lodging rooms (e.g., hotel rooms) *over existing conditions in the Precise Plan area*. Similar to Alternatives 1 through 3, the Existing Land Use Policy alternative could ultimately result in a *net reduction* of about 95,000 square feet of industrial floor area. As depicted in Table 18.1, in some instances the Existing Land Use Policy alternative would result in more growth than is anticipated under the Maximum and Moderate Intensity alternatives generally because, in some areas of Downtown, existing

land use policy permits office building heights greater than proposed under the other alternatives.

Under the Existing Land Use Policy alternative, compared to the Maximum Intensity alternative, the Precise Plan area would be developed at lower residential densities (e.g., dwelling units per acre) and retail intensities (e.g., floor area ratios), and with more and higher intensity office development (see Table 18.1). Potential impacts associated with future individual site modifications (e.g., impacts on a historic structure, potential loss of biological resources) would not necessarily be reduced under the existing zoning alternative because the basic site grading and disturbance resulting from individual development projects would not be significantly reduced. Similar impacts would result from, and similar mitigations would be applied to, each future site-specific development regardless of the actual size of the future structures on the site.

18.4.2 Alternative 4 Evaluation: Comparative Adverse and Mitigating Effects

(a) Land Use and Planning. The Existing Land Use Policy alternative would not result in any significant additional or significantly reduced land use or planning impacts. Downtown Redwood City would be developed according to existing Redwood City Strategic General Plan policy as identified in chapters 5 through 15 of this EIR.

(b) Population and Housing. The Existing Land Use Policy alternative would result in *increased* significant unavoidable impacts related to transportation and circulation and long-term regional air emissions compared to the Maximum Intensity alternative because the 321,000 square feet of additional office space under this alternative would generate more traffic trips and associated air pollution emissions despite the alternative's comparative reductions in population and housing (see [e] below). Compared to the Maximum Intensity alternative, this alternative would not have the same beneficial effect in assisting Redwood City in achieving a better citywide balance between employed residents and jobs, because the approximately 321,000 square feet of additional office space under this alternative would generate its own additional need for housing.

(c) Aesthetics and Visual Resources. Due primarily to the increased potential for future office development at intensities and heights greater than proposed under the Maximum Intensity alternative (office area building height allowances are greater under existing zoning than under the proposed Precise Plan), the Existing Land Use Policy alternative would result in *increased* impacts on aesthetics and visual resources according to the CEQA criteria, all of which could be reduced to less-than-significant levels by implementing the measures described in chapter 7 of this EIR..

(d) Cultural and Historic Resources. Similar to the Maximum Intensity alternative, this alternative would result in potentially significant impacts on cultural and historic resources, all of which could be mitigated to less-than-significant levels by implementing the measures described in chapter 8 of this EIR. Based on CEQA and recent case law, individual future developments affecting historic resources may require additional CEQA review.

(e) Transportation and Circulation. The comparative trip generation characteristics of each alternative are identified in Table 18.2. Compared to the Maximum Intensity alternative, the Existing Land Use Policy alternative would result in *increased* significant unavoidable, transportation and circulation impacts according to CEQA criteria, primarily due to the project-generated net increase of approximately 1,941 vehicular trips in the AM peak hour (292 more

than under the Maximum Intensity alternative) and 2,167 vehicular trips in the PM peak hour (257 more than under the Maximum Intensity alternative). These increases would generally result from the Existing Land Use Policy's 321,000 net additional square feet of office space compared to the Maximum Intensity alternative (see Table 18.1). Also, this alternative would not include the Precise Plan proposals for high-density, mixed land use patterns that promote walking, transit use, and shorter commutes, as well as Downtown improvements to help ensure that "pedestrian comfort, safety, convenience, and enjoyment have priority" (Precise Plan, Book I, Section 1.2--"Building the Vision").

(f) Public Services, Utilities, and Infrastructure. Similar to the Maximum Intensity alternative, this alternative would result in potentially significant impacts on public services, utilities, and infrastructure, all of which would be reduced to less-than-significant levels by implementing the measures described in chapter 10 of this EIR. This alternative does not include the Precise Plan-proposed improvements to the Downtown public space network.

(g) Noise. Similar to the Maximum Intensity alternative, this alternative would result in potentially significant demolition/construction period noise and vibration impacts, as well as potential exposure of new, noise-sensitive development (e.g., residences) to noise levels exceeding City noise standards. These noise impacts would be reduced to less-than-significant levels by implementing the measures described in chapter 11 of this EIR.

(h) Air Quality. Compared to the Maximum Intensity alternative, this alternative would result in similar potentially significant air quality impacts related to construction-period emissions, but *increased* long-term regional emissions due to the office-related additional vehicular trip generation. The construction emissions could still be reduced to a less-than-significant level with implementation of the mitigation described in chapter 12 of this EIR. Long-term emissions, however, would remain significant and unavoidable even with mitigation, primarily due to the project-generated net increase in daily vehicular trips by this alternative (even though this alternative would generate approximately 15 percent fewer daily vehicular trips than would the Maximum Intensity alternative). Also, this alternative would not include the Precise Plan proposals for high-density, mixed land use patterns that promote walking, transit use, and shorter commutes, as well as Downtown improvements to help ensure that "pedestrian comfort, safety, convenience, and enjoyment have priority" (Precise Plan, Book I, Section 1.2--"Building the Vision").

(i) Hazards and Hazardous Materials. Similar to the other alternatives, no potentially significant impact from hazards or hazardous materials would result from implementation of the Existing Land Use Policy alternative.

(j) Biological Resources. Similar to the Maximum Intensity alternative, this alternative would result in potentially significant biological resource impacts (i.e., potential loss of heritage trees, special-status species, and jurisdictional wetlands), all of which would be mitigated to less-than-significant levels with implementation of the measures included in chapter 14 of this EIR.

(k) Geology and Soils. Similar to the Maximum Intensity alternative, the Existing Land Use Policy alternative would result in potentially significant impacts related to seismic and soil erosion/sedimentation concerns, all of which would be mitigated to less-than-significant levels with implementation of the measures included in chapter 15 of this EIR.

(l) Project Consistency With Local and Regional Plans. Although not considered an *environmental impact*, a rezoning of the Precise Plan area to *Planned Community District* (P District) would not be required under the Existing Land Use Policy alternative. This alternative is considered consistent with local and regional plans, including the Redwood City Strategic General Plan, San Carlos Airport Land Use Plan, Association of Bay Area Governments (ABAG) Land Use Policy Framework, ABAG housing and population projections, the City=s adopted Urban Water Management Plan, and the Bay Area Air Quality Management District (BAAQMD) *Bay Area 2005 Ozone Strategy*.

(m) Attainment of City=s Project Objectives and Goals. This alternative would not attain the City=s project objectives and goals as identified in section 3.3 (Basic Project Objectives and Goals) of this EIR. The current General Plan and associated existing zoning provisions do not include the detailed and coordinated strategies, improvements, and contemporary development regulations proposed in the Precise Plan.

18.5 ALTERNATIVE 5: NO PROJECT--NO CHANGE IN EXISTING DEVELOPMENT

18.5.1 Principal Characteristics

As required by the CEQA Guidelines (section 15126.6[e][1]), Alternative 5 assumes that the Downtown Precise Plan would not be adopted or implemented, and the overall buildout characteristics of the Precise Plan area would remain in their current state (i.e., when this EIR=s Notice of Preparation was published in May 2006). None of the incremental changes identified in Table 18.1 would occur, and existing development in downtown Redwood City would remain constant over the next approximately 15 years. This No Development alternative represents the CEQA-defined baseline that can be compared with the other four alternatives.

18.5.2 Alternative 5 Evaluation: Comparative Adverse and Mitigating Effects

(a) Land Use and Planning. No significant land use or planning impacts would occur. Existing Precise Plan area land use characteristics would remain unchanged under the No Development alternative. Plan-related *beneficial effects on the physical arrangement of the community* (e.g., Downtown revitalization, improved pedestrian-oriented environment and transit access) would not occur.

(b) Population and Housing. No significant population or housing impacts would occur. The population, number of housing units, and number of jobs in the Precise Plan area would not increase over existing levels. This alternative would not result in the traffic, noise, air quality, and other impacts identified in this EIR. However, the reduced potential for new development under this alternative would mean fewer new housing units and less contemporary retail development in the Downtown area. Also, the *beneficial Plan-related effects* of new residential development near commercial uses, transit, and other services, and an improved jobs/housing balance in Redwood City, would not be realized.

(c) Aesthetics and Visual Resources. No significant adverse or beneficial aesthetic or visual impacts would occur. The existing visual character of the Precise Plan area would remain unchanged. The visual impacts associated with Precise Plan-facilitated development would not occur, nor would the *beneficial visual effects* associated with development under the Precise Plan be realized.

(d) Cultural and Historic Resources. No significant cultural or historic resource impacts would occur. All potential impacts resulting from demolition or degradation of existing cultural or historic resources in downtown Redwood City related to Precise Plan-facilitated development would not occur.

(e) Transportation and Circulation. No significant transportation or circulation impacts would occur. There would be no Precise Plan-related additional traffic generation or intersection impacts. Impacts from project construction period traffic and roadway improvement construction would not occur. However, the Precise Plan-facilitated improvements to the pedestrian environment and the convenient (walkable) availability of goods, services, and public transit to an increased Downtown residential population would not occur under this alternative.

(f) Public Services, Utilities, and Infrastructure. No significant public service, utility, or infrastructure impacts would occur under the No Development alternative. No changes in public service, utility, or infrastructure demands would occur. However, Precise Plan-related improvements to the Downtown public space network would not be realized.

(g) Noise. No significant noise impacts would occur. Construction period noise impacts directly associated with development (e.g., new building construction and pedestrian, infrastructure, and roadway improvements) in the Precise Plan area would not occur. Potential long-term impacts due to land use changes facilitated by, and increased traffic generated by, the Precise Plan would not occur.

(h) Air Quality. No significant air quality impacts would occur. The No Development alternative would have no short-term air quality impacts related to construction, and no long-term air quality impacts related to increases in traffic. Significant unavoidable impacts related to increases in air pollution emissions would be avoided under this impact. However, the air quality benefits associated with the Precise Plan—such as increased housing within walking distance of goods, services, public transit—would not be realized under this alternative.

(i) Hazards and Hazardous Materials. Similar to the other alternatives, no significant hazards or hazardous material impacts would occur.

(j) Biological Resources. No significant biological resource impacts would occur under the No Development alternative. There would be no change in existing biological conditions in the Precise Plan area. There would be no potential loss of heritage trees, special-status species (plant and animal), or wetlands.

(k) Geology and Soils. No significant geologic or soils impacts would occur. No grading or surface modifications, or potential impacts in the Precise Plan area resulting from seismic hazards (e.g., liquefaction) or soil/sedimentation characteristics, would be introduced.

(l) Project Consistency With Local and Regional Plans. Although not considered an *environmental impact*, a rezoning of the Precise Plan area to *Planned Community District* (P District) would not be required under the No Development alternative. All of the alternatives, including this alternative, are considered consistent or substantially consistent with existing Redwood City Strategic General Plan policy. However, this alternative would not be consistent with the City=s Draft Housing Element policies for provision of the city=s fair share of regional

housing needs (as determined by the Association of Bay Area Governments), while the other alternatives would be consistent with those policies.

(m) Attainment of City=s Project Objectives and Goals. The No Development alternative would not achieve any of the Precise Plan=s objectives or goals identified in section 3.3 (Basic Project Objectives and Goals) of this EIR.

18.6 CONCLUSIONS: ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines (section 15126[e][2]) stipulate, “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Table 18.3 which follows provides a consolidated, summary comparison of the environmental implications of the various identified project alternatives for all of the environmental issues considered in this EIR. When viewed together, Tables 18.1, 18.2, and 18.3 indicate that, of the various alternatives evaluated in this EIR other than the No Project--No Change in Existing Development alternative, the **Precise Plan Moderate Intensity alternative** (Alternative 2) would result in the least adverse combination of environmental impacts. This conclusion is based on the following information:

- (1) The Moderate Intensity alternative would result in the lowest degree of **quantitative impacts** (e.g., traffic generation, air pollution emissions, traffic noise) due to its reduced potential residential density and commercial development intensity compared to the other alternatives (Table 18.1);
- (2) The Moderate Intensity alternative would not result in any **additional** significant unavoidable environmental impacts compared to the other alternatives (Table 18.3);
- (3) This alternative would be substantially consistent with local and regional plans (Table 18.3); and
- (4) This alternative would attain the Precise Plan objectives and goals (but to a lesser degree due to its reduced potential residential density and commercial development intensity compared to the other alternatives) (Tables 18.1, 18.2, and 18.3).

**Table 18.3
ALTERNATIVES COMPARISON: SUMMARY OVERVIEW**

Impact	Alternatives				
	Alternative 1: Precise Plan Maximum Intensity Scenario	Alternative 2: Precise Plan Moderate Intensity Scenario	Alternative 3: Modified Precise Plan--Reduced Height	Alternative 4: No Project--Existing Land Use Policy (Zoning)	Alternative 5: No Project--No Development
(a) Land Use and Planning	No potentially significant environmental impacts.	No potentially significant environmental impacts.	No potentially significant environmental impacts.	No potentially significant environmental impacts.	No potentially significant environmental impacts, but no Downtown improvements.
(b) Population and Housing	Potentially significant environmental impacts. Remaining significant unavoidable impact.	Reduced, but still potentially significant, environmental impacts. Remaining significant unavoidable impact.	Reduced, but still potentially significant, environmental impacts. Remaining significant unavoidable impact.	Increased environmental impacts. Remaining significant unavoidable impact.	No potentially significant environmental impacts, but no new housing or jobs Downtown.
(c) Aesthetics and Visual Resources	Potentially significant environmental impacts. All mitigable.	Reduced, but still potentially significant, environmental impacts. All mitigable.	Reduced, but still potentially significant, environmental impacts. All mitigable.	Increased environmental impacts. All mitigable.	No potentially significant environmental impacts, but no visual improvements.
(d) Cultural and Historic Resources	Potentially significant environmental impacts. All mitigable.	Similar, potentially significant environmental impacts. All mitigable.	Similar, potentially significant, environmental impacts. All mitigable.	Similar, potentially significant, environmental impacts. All mitigable.	No potentially significant environmental impacts.
(e) Transportation and Circulation	Potentially significant environmental impacts. Remaining significant unavoidable impact.	Reduced, but still potentially significant, environmental impacts. Remaining significant unavoidable impact.	Reduced, but still potentially significant, environmental impacts. Remaining significant unavoidable impact.	Increased environmental impact. Remaining significant unavoidable impact.	No potentially significant environmental impacts, but no pedestrian improvements.
(f) Public Services, Utilities, and Infrastructure	Potentially significant environmental impacts. Remaining significant unavoidable impact.	Reduced, but still potentially significant, environmental impacts. Remaining significant unavoidable impact.	Reduced, but still potentially significant, environmental impacts. Remaining significant unavoidable impact.	Similar, potentially significant environmental impacts. Remaining significant unavoidable impact.	No potentially significant environmental impacts, but no public space improvements.
(g) Noise	Potentially significant environmental impacts. All mitigable.	Reduced, but still potentially significant, environmental impacts. All mitigable.	Reduced, but still potentially significant, environmental impacts. All mitigable.	Similar, potentially significant environmental impacts. All mitigable.	No potentially significant environmental impacts.

(h) Air Quality	Potentially significant environmental impacts. Remaining significant unavoidable impact.	Reduced, but still potentially significant, environmental impacts. Remaining significant unavoidable impact.	Reduced, but still potentially significant, environmental impacts. Remaining significant unavoidable impact.	Increased environmental impacts. Remaining significant unavoidable impact.	No potentially significant environmental impacts, but no air quality benefits of high-density mixed use.
(i) Hazards and Hazardous Materials	No potentially significant environmental impacts.	No potentially significant environmental impacts.	No potentially significant environmental impacts.	No potentially significant environmental impacts.	No potentially significant environmental impacts.
(j) Biological Resources	Potentially significant environmental impacts. All mitigable.	Similar, potentially significant environmental impacts. All mitigable.	Similar, potentially significant environmental impacts. All mitigable.	Similar, potentially significant environmental impacts. All mitigable.	No potentially significant environmental impacts.
(k) Geology and Soils	Potentially significant environmental impacts. All mitigable.	Reduced, but still potentially significant, environmental impacts. All mitigable.	Reduced, but still potentially significant, environmental impacts. All mitigable.	Similar, potentially significant environmental impacts. All mitigable.	No potentially significant environmental impacts.
(l) Project Consistency With Local and Regional Plans	Substantially consistent.	Substantially consistent.	Substantially consistent.	Consistent.	Substantially consistent--no fair share of regional housing.
(m) Attainment of Project Objectives and Goals	Full attainment.	Partial attainment.	Partial attainment.	No attainment.	No attainment.

SOURCE: Wagstaff and Associates

