5. Alternatives

The following discussion is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any of the significant effects of the proposed project. The California Environmental Quality Act (CEQA) Guidelines set forth the intent and extent of alternatives analysis to be provided in an environmental impact report (EIR). Section 15126.6(a) of the CEQA Guidelines states that:

> *An EIR shall describe a range of reasonable alternatives to the project, or 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. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives, which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason*.

5.1 INTRODUCTION

The alternatives evaluated in this Draft EIR were developed consistent with Section 15126.6(b) of the CEQA Guidelines, which states that:

> *Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the 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.*

Section 15126.6(c) of the CEQA Guidelines states:

> *The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.*

5.2 PROJECT OBJECTIVES

As stated above, the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the proposed project. As listed in Chapter 3, *Project Description*, of this Draft EIR, the primary purposes of the proposed project are to plan for the growth and conservation of San Mateo over a 20-year time horizon and to:

- Identify the location and allowed density and intensity of San Mateo's land uses including housing, businesses, industry, open space, schools, civic buildings, etc.
- Plan for future circulation and infrastructure improvements.
- Identify sufficient residential land to meet the current and future housing needs for people at all income levels.
- Protect natural resources, such as water, air, trees, and hillsides, and preserve and improve open spaces, including open space for recreation, for habitat, or for public health and safety.
- Protect residents from harmful or disruptive levels of noise.
- Keep the community safe from natural and human-caused hazards, such as earthquakes, landslides, floods, and wildfires, including increased risks from climate change.
- Improve the safety and quality of life for residents of neighborhoods that face a combination of both higher-than-average pollution exposure and social and economic challenges such as low incomes, language barriers, or housing instability (Equity Priority Areas).

5.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

All the potential environmental impacts associated with adoption and implementation of the proposed project were found to be either less than significant without mitigation or less than significant with mitigation, except for impacts to air quality (AIR), noise (NOISE), and wildfire (WILD), which were found to be significant and unavoidable with mitigation measures at the program level. Although the proposed General Plan 2040 results in significant and unavoidable impacts, the identification of these program-level impacts do not preclude the finding of less-than-significant impacts for subsequent development proposals analyzed at the project level that do not exceed the applicable project-level thresholds. The significant and unavoidable impacts identified for the proposed project include the following:

Air Quality

- **Impact AQ-2:** Construction of development projects that could occur from implementation of the proposed project would generate emissions that would exceed the Bay Area Air Quality Management District's regional significance thresholds and cumulatively contribute to the nonattainment designations of the San Francisco Bay Area Air Basin.
- **Impact AQ-3:** Operation of development projects under the proposed project would generate operational emissions that would exceed the Bay Area Air Quality Management District's regional significance thresholds for volatile organic compounds (VOC) and nitrogen oxides (NO_X).

- **Impact AQ-4:** Construction emissions associated with development under the proposed project could expose air quality-sensitive receptors to substantial toxic air contaminant concentrations and exceed the Bay Area Air Quality Management District's project-level and cumulative significance thresholds.
- **Impact AQ-6:** Implementation of the proposed project would generate a substantial increase in emissions that exceeds the Bay Area Air Quality Management District's significance thresholds and would cumulatively contribute to the nonattainment designations and health risk in the San Francisco Bay Area Air Basin.

Noise

- **Impact NOISE-1:** Buildout under the proposed project is anticipated to result in unacceptable traffic noise with an increase of more than 5.0 dBA L_{dn} over existing conditions along one roadway segment (1st Avenue west of B Street) within the EIR Study Area.
- **Impact NOISE-6:** Buildout under the proposed project is anticipated to result in unacceptable cumulative traffic noise within the EIR Study Area.

Wildfire

- **Impact WILD-2**: Development under the proposed project would increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.
- **Impact WILD-5:** Potential development under the proposed project could, in combination with other surrounding and future projects in the State Responsibility Areas, Very High Fire Hazard Severity Zones, or Wildland Urban Interface, result in cumulative impacts associated with the exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors.

The alternatives were selected because of their potential to further reduce and avoid these impacts.

5.4 OVERVIEW OF PROJECT ALTERNATIVES

Two project alternatives and the comparative merits of the alternatives are discussed in this section in accordance with the CEQA Guidelines.

The alternatives to be analyzed in comparison to the proposed project include:
- No Project Alternative, which would maintain the current adopted General Plan
- Reduced Traffic Noise Alternative

The first alternative is the CEQA-required "No Project" Alternative, which assumes the current General Plan 2030 and Climate Action Plan (CAP) remain in effect and are not replaced by the proposed project. The second alternative is the Reduced Traffic Noise Alternative and is intended to reduce traffic noise by reducing vehicle travel throughout the EIR Study Area. Under this alternative, the proposed CAP update would be adopted.

5.4.1 ASSUMPTIONS AND METHODOLOGY

The alternatives analysis is presented as a comparative analysis to the proposed project. The development intensity for the alternatives varies from the proposed project. The estimated growth under each alternative, as well as the proposed project, is provided in Table 5-1, *Development Projections for the Proposed Project and Project Alternatives*.

TABLE 5-1 DEVELOPMENT PROJECTIONS FOR THE PROPOSED PROJECT AND PROJECT ALTERNATIVES

Category	Proposed General Plan 2040 (2040) [a]	No Project Alternative (2030) [b]	Reduced Traffic Noise Alternative (2040)
Housing Units	65,180	53,704	65,180
Population	160,040	133,749	160,040
Jobs	79,360	65,300	79,360

Sources and notes:
a. PlaceWorks, 2022.
b. Includes housing development required to achieve the City's 2023-2031 Regional Housing Needs Allocation, plus a buffer. See Table 5-3, *2030 Development Projections Under the No Project Alternative*. 2040 buildout under the No Project Alternative have not been calculated, as the City's existing General Plan has a horizon year of 2030 that would have to be updated to extend the buildout horizon past 2030. Overall, development under the current General Plan, as considered in the No Project Alternative, would be expected to be lower than the buildout analyzed for the proposed General Plan 2040.

The alternatives analysis assumes that all applicable mitigation measures recommended for the proposed project and the proposed General Plan 2040 goals, policies, and actions would apply to the Reduced Traffic Noise Alternative but would not apply to the No Project Alternative.

5.4.2 SUMMARY OF ALTERNATIVES EVALUATION

The following discussion compares the environmental impacts of the alternatives with those of the proposed project for each of the environmental topics analyzed in detail in Chapter 4, *Environmental Analysis*, of this Draft EIR. The impacts of each alternative are classified as less than (<), similar or comparable to (=), or greater than (>) the level of impacts associated with the proposed project. Table 5-2, *Comparison of Impacts of the Proposed Project and Project Alternatives*, summarizes the relative impacts of each of the alternatives compared to the proposed project.

TABLE 5-2 COMPARISON OF IMPACTS OF THE PROPOSED PROJECT AND PROJECT ALTERNATIVES

Topic	Proposed Project [a]	No Project Alternative	Reduced Traffic Noise Alternative
Aesthetics	LTS	>	=
Air Quality	SU	=	<
Biological Resources	LTS	=	=
Cultural Resources	LTS	=	=
Energy	LTS	>	<
Geology and Soils	LTS	<	=
Greenhouse Gas Emissions	LTS	>	<
Hazards and Hazardous Materials	LTS	<	=
Hydrology and Water Quality	LTS	=	=
Land Use and Planning	LTS	>	<
Noise	SU	>	<
Parks and Recreation	LTS	<	=
Population and Housing	LTS	>	=
Public Services	LTS	<	=
Transportation	LTS	>	<
Tribal Cultural Resources	LTS	=	=
Utilities and Service Systems	LTS	>	=
Wildfire	SU	=	=

Notes:
[a] The impacts listed in this column represent the highest significance determination for each respective standard of significance.

LTS	Less than Significant	<	Lessened impact in comparison to the proposed project
LTS/M	Less than Significant with Mitigation	=	Similar impact in comparison to the proposed project
SU	Significant and Unavoidable	>	Greater impact in comparison to the proposed project

5.5 NO PROJECT ALTERNATIVE (CURRENT GENERAL PLAN)

5.5.1 DESCRIPTION

Pursuant to CEQA Guidelines Section 15126.6(e)(1), the No Project Alternative is required as part of the "reasonable range of alternatives" to allow decision makers to compare the impacts of approving the proposed project with the impacts of taking no action or not approving the proposed project. Consistent with CEQA Guidelines Section 15126.6(e)(3)(A), when the project is the revision of a plan, as in this case, the no project alternative will be the continuation of the existing plan(s). Under the No Project Alternative, potential future development in San Mateo would continue to be subject to existing policies, regulations, development standards, and land use designations of the existing General Plan 2030 and the existing CAP.

As described in Chapter 3, *Project Description*, of this Draft EIR, the existing General Plan 2030 was adopted in 2010 and included a horizon year of 2030. While this horizon year is still 7 years away (as of the time of publishing this Draft EIR), in the years between 2010 and 2023 conditions inside and outside of San Mateo have changed, including the economic recovery from the Great Recession, a worsening housing crisis in California, ongoing impacts from climate change, and the COVID-19 pandemic that

began in 2020. A number of State and federal laws guiding general plan policies have also been updated during this time.

Many of the community issues vetted in the General Plan 2030 are still relevant, well addressed, and do not require major changes. However, the No Project Alternative would not incorporate new topics that are now required by State law, such as environmental justice, and would not revise relevant policies and actions to meet those requirements. The No Project Alternative would also not address other emerging issues addressed in the proposed General Plan 2040, such as sea level rise, autonomous vehicles, and green infrastructure.

Pursuant to CEQA Guidelines Section 15126.6(e)(3)(C), the City of San Mateo, acting as the lead agency, should analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services. Under the No Project Alternative, none of the applicable mitigation measures recommended for the proposed project would apply.

Buildout projections for the No Project Alternative are shown in Table 5-3, *2030 Development Projections Under the No Project Alternative*. In January 2023, the City adopted its 2023-2031 Housing Element, which is now part of the existing General Plan 2030 and identifies housing sites throughout the city that could be developed with up to 9,934 new housing units by January 2031. This covers the City's assigned regional housing needs allocation (RHNA) of 7,015 and provides a buffer. The buildout projections take into account baseline conditions for 2019 plus the buildout anticipated in the City's current General Plan.

TABLE 5-3 2030 DEVELOPMENT PROJECTIONS UNDER THE NO PROJECT ALTERNATIVE

Category	Existing Conditions (2019)	Adopted 2023-2031 Housing Element	2030 Buildout
Housing Units	43,770	9,934	53,704
Population	108,020	25,729 [a]	133,749
Jobs	62,440	N/A	65,300 [b]

Notes:
a. Population calculated based on an average household size of 2.59 persons per household (consistent with the household size used for the buildout projections in Chapter 3, *Project Description*, of this Draft EIR).
b. City of San Mateo, 2009, *General Plan Update Draft Environmental Impact Report*, page 4.2-6.
Source: City of San Mateo, 2009; PlaceWorks, 2022.

5.5.2 IMPACT DISCUSSION

The potential environmental impacts associated with the No Project Alternative when compared to the proposed project are described herein.

5.5.2.1 AESTHETICS

As described in Chapter 4.1, *Aesthetics*, of this Draft EIR, the proposed project would not result in any significant impacts related to aesthetics and no mitigation measures are required.

Unlike the proposed project, development that would occur under the No Project Alternative would not be concentrated in the ten General Plan Land Use Study Areas and instead would be spread throughout the city. This would result in the potential for greater impacts to scenic vistas when compared to the proposed project.

There are no officially designated scenic view corridors, vistas, or State-designated scenic highways within, or in the vicinity of, the EIR Study Area. Therefore, like the proposed project, the No Project Alternative would not damage existing scenic resources associated with scenic view corridors, vistas, or State-designated scenic highways and impacts would be similar.

Under both the proposed project and the No Project Alternative, future projects would be subject to applicable design review requirements prior to project approval pursuant to *San Mateo Design Guidelines* and would be required to comply with the applicable planning documents that govern scenic quality in the city, as described in Section 4.1.1.1, *Regulatory Framework*, in Chapter 4.1. However, the No Project Alternative would not include the new or modified goals, policies, or actions that were prepared as part of the proposed General Plan 2040. Thus, unlike the proposed project, development under this alternative would not provide the same level of design consideration related to the visual character or quality of a project site and its surroundings. Impacts would be greater than those of the proposed project.

Similar to the proposed project, the No Project Alternative would result in new lighting sources that could result in sources of glare. Potential future development under both the proposed project and the No Project Alternative would be required to comply with best management practices in CALGreen and the San Mateo Municipal Code (SMMC) provisions that ensure new land uses do not generate excessive light levels and that future development reduce light and glare spillover to surrounding land uses. However, the No Project Alternative would not include the new or modified goal and policy prepared as part of the proposed General Plan that require nighttime lighting to be energy efficient, protect dark skies, and minimize light spillage to adjacent properties. Therefore, impacts related to light and glare would be greater when compared to the proposed project.

Overall, development in the EIR Study Area under the No Project Alternative would continue to be subject to the current policies and regulations that guide development in San Mateo and would not include the new or modified goals, policies, or actions of the proposed General Plan. As such, impacts related to aesthetics would be *greater* when compared to the proposed project.

5.5.2.2 AIR QUALITY

As described in Chapter 4.2, *Air Quality*, of this Draft EIR, the proposed project would result in significant and unavoidable impacts during the construction and operational phases even with implementation of Mitigation Measures AQ-2, AQ-3, and AQ-4.

The No Project Alternative would continue development as allowed under the existing General Plan 2030, which would result in less development in the EIR Study Area compared to the proposed project. Development under both the proposed project and the No Project Alternative would be subject to the Bay Area Air Quality Management District's (BAAQMD's) basic control measures for fugitive dust control and screening sizes. Additionally, future development under both the proposed project and the No Project Alternative could result in construction activities within 1,000 feet of residential and other sensitive land uses, thus, temporarily elevating concentrations of toxic air contaminants and diesel particulate matter in the vicinity of sensitive land uses. While future development under the No Project Alternative would be subject to the same regulations as the proposed project to mitigate construction impacts, less development—and thus reduced emission levels—would occur under the No Project Alternative; therefore, construction air quality impacts would be lessened when compared to the proposed project.

Under the No Project Alternative, reduced development would occur compared to the proposed project; therefore, reduced direct and indirect criteria air pollutant emissions from energy (e.g., natural gas use) and area sources (e.g., aerosols and landscaping equipment) would occur. Under both the proposed project and the No Project Alternative, subsequent environmental review of applicable development projects would be required to assess potential impacts under BAAQMD's project-level thresholds. As demonstrated in Chapter 4.15, *Transportation*, the total vehicle miles traveled (VMT) per capita and VMT per employee would be lower under the proposed project than existing 2020 conditions (14.6 VMT per capita compared to the existing 2020 conditions of 16.0 VMT per capita, and 15.3 VMT per employee compared to existing 2020 conditions of 16.4 VMT per employee). This reduction is due to focusing future development under the proposed project near public transit. Although both the proposed project and the No Project Alternative would increase total VMT in comparison to existing conditions, the No Project Alternative would not include the new and modified goals, policies, or actions in the proposed General Plan 2040 that aim to concentrate development in the ten General Plan Land Use Study Areas and site future development near public transit and existing services. Therefore, while the No Project Alternative would result in less overall development than the proposed project, development would be less efficient as measured by VMT per capita and per employee metrics. Overall, operational air quality impacts would be considered greater when compared to the proposed project.

Under the No Project Alternative, the City's existing CAP would remain in place. Because the proposed CAP update does not include changes to the strategies in the City's existing CAP, under both the proposed project and the No Project Alternative the City's CAP would be consistent with the BAAQMD's 2017 Clean Air Plan goal to reduce GHG emissions and protect the climate.

Overall, because the No Project Alternative would result in less concentrated development and generate more VMT per service population, the operational impacts would be greater than the proposed project. However, due to the proposed project having a higher development potential, the construction impacts would be greater than under the No Project Alternative. Overall, the No Project Alternative would result in *similar* air quality impacts when compared to the proposed project.

5.5.2.3 BIOLOGICAL RESOURCES

As described in Chapter 4.3, *Biological Resources*, of this Draft EIR, the proposed project would result in less-than-significant impacts to biological resources and no mitigation measures are required.

The EIR Study Area is not within any local, regional, or State habitat conservation plan areas. Therefore, neither the proposed project nor the No Project Alterative would conflict with the conservation strategy in any Habitat Conservation Plan or Natural Community Conservation Plan and impacts would be similar.

Potential future development under the proposed project could potentially affect special-status species, riparian habitats, wetlands, and wildlife movement corridors. Adherence to the new and modified goals, policies, and actions of the proposed General Plan 2040 as well as all federal, State, and local regulations relating to biological resources would fully mitigate any potential impacts. While the No Project Alternative would not include the new and modified goals, policies, or actions of the proposed General Plan to reduce effects to biological resources, because the No Project Alternative would result in less development than the proposed project, fewer potential impacts to special-status species, riparian habitats, wetlands, and wildlife movement corridors would occur, and impacts to these resources would be similar when compared to the proposed project.

Therefore, impacts to biological resources from potential future development as allowed under the No Project Alternative would be *similar* when compared to the proposed project**.**

5.5.2.4 CULTURAL RESOURCES

As described in Chapter 4.4, *Cultural Resources*, of this Draft EIR, the proposed project would result in less-than-significant impacts to cultural resources and no mitigation measures are required.

Under the No Project Alternative, new development would continue throughout the EIR Study Area under existing plans and regulations. As explained in Chapter 4.4, there are existing prehistoric, architectural, historical, and archaeological resources in the EIR Study Area that could be adversely affected by new demolition, inappropriate building modification, or incompatible new construction. These effects would be similar under both the proposed project and the No Project Alternative. Like the proposed project, the No Project Alternative would be subject to the same federal, State, and local regulations to reduce adverse effects to cultural resources, such as those in the Public Resources Code, California Health and Safety Code, and the California Code of Regulations. However, because less development would occur under the No Project Alternative, the potential to affect these resources would be lessened when compared to the proposed project.

The proposed project includes new and modified General Plan 2040 goals, policies, and actions that require additional considerations to further protect historic and archaeological resources in the EIR Study Area. Under the No Project Alternative, these goals, policies, and actions would not be adopted. Therefore, overall, the No Project Alternative would have *similar* impacts to cultural resources as compared to the proposed project when following common protocols.

5.5.2.5 ENERGY

As described in Chapter 4.5, *Energy*, of this Draft EIR, the proposed project would not result in any significant impacts related to energy and no mitigation measures are required.

All development in California is required to comply with building requirements in the California Green Building Code and Building and Energy Efficiency Standards, which ensure new development would not result in the wasteful or inefficient use of energy. Additionally, neither the proposed project nor the No Project Alternative would introduce a level of development and population growth that would be anticipated to necessitate the construction of new energy supply facilities or transmission infrastructure.

The proposed project includes new and modified General Plan goals, policies, and actions that require additional actions that would further ensure energy efficiency in the EIR Study Area. These include coordinating with interagency partners and community stakeholders to seek funding opportunities to design, construct, and build the priority projects identified in the Transit-Oriented Development Access Pedestrian Plan. Because transportation is a leading source of energy use in San Mateo, these new and modified goals, policies, and actions promote energy conservation from the transportation sector by increasing safe and sufficient transit, bicycle, and pedestrian facilities to reduce automobile use and VMT. The No Project Alternative would not adopt these new and modified General Plan goals, policies, or actions. As described in Section 5.4.2.2, Air Quality, because the No Project Alternative would result in less concentrated development, it would generate a higher level of VMT per service population and would therefore represent less efficient energy usage for transportation.

Under the No Project Alternative, the City's existing CAP would remain in place. Because the proposed CAP update does not include changes to the strategies in the City's existing CAP, under both the proposed project and the No Project Alternative the City's CAP would contribute toward minimizing inefficient, wasteful, or unnecessary transportation energy consumption, and ensure compliance with State, regional, or local plans for renewable energy.

Less development would occur under the No Project Alternative, so energy consumption from construction would be reduced when compared to the proposed project. However, overall impacts related to energy use from VMT would be *greater* under the No Project Alternative because while there is less development potential, future development would not be focused near public transit and energy usage would be less efficient when compared to the proposed project.

5.5.2.6 GEOLOGY AND SOILS

As described in Chapter 4.6, *Geology and Soils*, of this Draft EIR, the proposed project would result in less-than-significant impacts related to geology and soils and no mitigation measures are required.

Future development under both the proposed project and the No Project Alternative would be subject to the same federal, State, and local regulations that address and prevent hazards associated with geology, soils, and seismicity. Although the No Project Alternative would result in less overall development, compliance with existing regulations related to geologic and seismic safety would apply similarly to future development under both the No Project Alternative and the proposed project.

While State and local regulations to reduce hazards related to geology and soils would apply equally under both the proposed project and the No Project Alternative, there is less development potential under the No Project Alternative and therefore fewer structures and people would be exposed to potential geologic hazards. Therefore, the No Project Alternative would result in *lessened* geological impacts than when compared to the proposed project.

5.5.2.7 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.7, *Greenhouse Gas Emissions*, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required when applying program-level thresholds for the forecast year 2040.

New buildings constructed under both the proposed project and the No Project Alternative would be subject to the triennial updates to California's Building and Energy Efficiency Standards, which would presumably become more stringent over time. While new buildings would be more energy efficient, there would be an overall increase in energy usage under the proposed project from construction when compared to the No Project Alternative, due to the greater amount of proposed growth. Since the No Project Alternative would result in less development than the proposed project, GHG emissions from construction and stationary sources use would be lessened under the No Project Alternative.

As described in Section 5.4.2.2, Air Quality, because the No Project Alternative would result in less concentrated development, it would generate a higher level of VMT per service population. The No Project Alternative would not include the new and modified goals, policies, actions, or land use mix of the proposed General Plan 2040 that would site future development near public transit and existing services to reduce GHG emissions associated with vehicular travel. Therefore, while the No Project Alternative would result in less overall development than the proposed project, development would be less efficient as measured by VMT per capita and per employee metrics. Overall, GHG emission impacts from mobile sources under the No Project Alternative would be considered greater than under the proposed project.

Under the No Project Alternative, the City's existing CAP would remain in place. The City's existing CAP includes forecasts for 2020, 2030, and 2050 to demonstrate compliance with the targets of Assembly Bill 32, Senate Bill 32, and Executive Order S-03-05, respectively. The CAP update under the proposed project would include a new forecast for 2045, consistent with Assembly Bill 1279, which directs a minimum statewide reduction of GHGs to at least 85 percent below 1990 levels by 2045. Without the CAP update, the City cannot show compliance with AB 1279. In addition, while the existing CAP demonstrates consistency with Executive Order S-03-05 for achieving an 80 percent reduction from 1990 levels by 2050, by updating the reduction target and forecasts consistent with AB 1279 and achieving an 85 percent reduction by 2045, the proposed CAP update accelerates the GHG reduction schedule and increases the GHG reduction amount. The No Project Alternative would not include these updates to the City's CAP.

In summary, overall impacts from GHG emissions under the No Project Alternative would be *greater* when compared to the proposed project.

5.5.2.8 HAZARDS AND HAZARDOUS MATERIALS

As described in Chapter 4.8, *Hazards and Hazardous Materials*, of this Draft EIR, the proposed project would result in less-than-significant impacts related to hazards and hazardous materials and no mitigation measures are required.

Potential future development that could occur in the EIR Study Area from implementation of both the proposed project and the No Project Alternative would be required to comply with all federal, State, and local regulations pertaining to hazards and hazardous materials. However, because there is less development potential under the No Project Alternative, potential risks associated with transport, use, disposal, emission, or storage of hazardous materials would be lessened. Neither the proposed project nor the No Project Alternative would be expected to expose people to excessive airport-related noise, or to impair an emergency evacuation plan.

Overall, the No Project Alternative would have slightly *lessened* impacts when compared to the proposed project.

5.5.2.9 HYDROLOGY AND WATER QUALITY

As described in Chapter 4.9, *Hydrology and Water Quality,* of this Draft EIR, the proposed project would not result in any significant impacts related to hydrology and water quality and no mitigation measures are required. Compliance with existing State and local regulations and procedures would ensure that pre- and post-construction impacts to water quality would be less than significant.

The No Project Alternative would result in less development overall than the proposed project. However, due to the built-out nature of the EIR Study Area, under both the proposed project and the No Project Alternative nearly all future development would occur within previously urbanized areas. Much like the proposed project, the No Project Alternative would connect to existing drainage systems already in place and would be subject to the same existing federal, State, and local regulations relating to hydrology and water quality. Compliance with existing regulations would minimize pre- and post-construction impacts to water quality as future development occurs under both the proposed project and the No Project Alternative.

The proposed project includes new and modified General Plan 2040 goals, policies, and actions related to hydrology and water quality to further minimize impacts. For example, new and modified General Plan 2040 policies and actions would require the City to coordinate with Cal Water and Estero Municipal Improvement District upon each update of the respective Urban Water Management Plans and track, and make available to the community, water use by land use type. However, under the No Project Alterative, these new and modified goals, policies, and actions would not be implemented.

While the No Project Alternative involves less development potential, this alternative would continue implementation of General Plan 2030 and would not implement the new and modified policies of the proposed General Plan 2040 to further minimize impacts related to hydrology and water quality. Therefore, overall, the No Project Alternative would have *similar* impacts to hydrology and water quality when compared to the proposed project.

5.5.2.10 LAND USE AND PLANNING

As described in Chapter 4.10, *Land Use and Planning*, of this Draft EIR, the proposed project would not result in any significant impacts related to land use and planning and no mitigation measures are required.

The existing General Plan 2030 was adopted with the purpose of harmonizing changes to existing developed areas to better serve community needs. Both the proposed project and the No Project Alternative would aim to improve connectivity and integrate infill development, and would not create physical barriers within existing communities. Accordingly, impacts related to division of an established community would be similar under both the proposed project and the No Project Alternative.

Under the No Project Alternative, development would continue to occur throughout the EIR Study Area under the existing General Plan 2030 and would not conflict with the City's development standards currently in place. However, the No Project Alternative would not implement new and modified General Plan 2040 goals, policies, or actions, nor would it focus development in the ten General Plan Land Use Study Areas. Therefore, in comparison to the proposed project, the No Project Alternative would not achieve the same level of consistency with the intent of *Plan Bay Area 2050*, which provides a framework for future development in the Bay Area to meet the State's GHG and VMT reduction goals through the concentration of development in downtowns and centers near jobs and services. Therefore, impacts under the No Project Alternative would be *greater* than under the proposed project.

5.5.2.11 NOISE

As described in Chapter 4.11, *Noise*, of this Draft EIR, the proposed project would result in significant and unavoidable project-level and cumulative impacts due to a modeled traffic noise increase of more than 5.0 dBA Ldn over existing conditions along one roadway segment within the EIR Study Area.

Future development allowed under the proposed project would be subject to the standards of the SMMC as well as the new and modified goals, policies, and actions of the proposed General Plan 2040, including those relating to the interface between residential and nonresidential land uses. As specific uses are proposed for particular sites, project-level design, permitting, and/or environmental review would serve to ensure that individual uses would comply with the noise regulations. Future development under the No Project Alternative would also be subject to these applicable standards but would continue compliance with the existing General Plan 2030 rather than implementing the new and modified General Plan 2040 goals, policies, and actions. However, because the No Project Alternative would result in less development, less construction would occur, and there would be lessened construction-related noise and vibration impacts.

The No Project Alternative would not include the new and modified goals, policies, or actions in the proposed General Plan 2040 that aim to concentrate development in the ten General Plan Land Use Study Areas and would thereby lessen the benefits gained from siting future development near public transit and existing services to reduce VMT. As a result, it is expected that VMT per capita and per employee would be higher than under the proposed project, which would increase overall vehicle traffic noise levels throughout the EIR Study Area when compared to the proposed project. Therefore, the No

Project Alternative would have the potential to worsen the significant and unavoidable impacts identified for the proposed project.

While the No Project Alternative would result in lessened construction noise impacts, it would worsen the significant and unavoidable noise impacts of the proposed project. Therefore, overall impacts would be considered *greater* under the No Project Alternative when compared to the proposed project.

5.5.2.12 PARKS AND RECREACTION

As discussed in Chapter 4.12, *Parks and Recreation*, of this Draft EIR, the proposed project would not result in any significant impacts related to parks and recreation, and no mitigation measures are required.

The No Project Alternative would result in fewer new residents and jobs in the EIR Study Area and, therefore, would result in a lower level of demand on the parks and recreation areas that serve the EIR Study Area. Like the proposed project, potential future development under the No Project Alternative would be required to comply with all existing City regulations that require development to either provide parkland or pay in-lieu fees for the City to dedicate parkland elsewhere.

Overall, impacts under the No Project Alternative would be slightly *lessened* when compared to those of the proposed project.

5.5.2.13 POPULATION AND HOUSING

As described in Chapter 4.13, *Population and Housing*, of this Draft EIR, the proposed project would not result in any significant impacts related to population and housing, and no mitigation measures are required. It is important to note that Chapter 4.13 utilizes regional projections from ABAG's *Plan Bay Area 2040* because *Plan Bay Area 2050* does not provide growth projections at the city level. As described in Chapter 4.13, the proposed project would exceed the projections in *Plan Bay Area 2040* for San Mateo but would generally be in line with county-level projections in *Plan Bay Area 2050*.

Chapter 4.13 compares the 2040 development projections of the proposed project to ABAG's 2040 projections. Projections under the No Project Alternative for 2040 have not been calculated, as the City's existing General Plan has a horizon year of 2030. Regional projections for 2030 provided in *Plan Bay Area 2040* are therefore used for this analysis.

As shown in Table 5-1, *Development Projections for the Proposed Project and Project Alternatives*, the No Project Alternative is assumed to have a 2030 buildout potential of 53,704 housing units, 133,749 residents, and 65,300 jobs. In comparison, ABAG projects 48,335 housing units, 123,200 residents, and 66,510 jobs in San Mateo in 2030.[1] While the No Project Alternative would not exceed ABAG's jobs projections, it would exceed population and housing projections. Therefore, the development

[1] Association of Bay Area Governments and Metropolitan Transportation Commission, updated May 1, 2019, Projections 2040 by Jurisdiction, https://data.bayareametro.gov/Demography/Projections-2040-by-Jurisdiction/grqz-amra, accessed February 16, 2023.

projections for both the proposed project and No Project Alternative would exceed regional projections published in *Plan Bay Area 2040*.[2]

Unlike the proposed project, the No Project Alternative would not include the updated policy framework that ensures adequate planning to accommodate population increases and future development beyond 2030.

As under the proposed project, implementation of the No Project Alternative would result in a net increase in housing; therefore, it would not require replacement housing outside of the EIR Study Area. Therefore, potential impacts associated with displacement under the No Project Alternative would be similar when compared to those of the proposed project.

In summary, while the No Project Alternative involves a reduced buildout potential in comparison to the proposed project, impacts related to population and housing would be *greater* when compared to the proposed project as the current General Plan 2030 has not been updated to comprehensively account for changes through 2040.

5.5.2.14 PUBLIC SERVICES

As described in Chapter 4.14, *Public Services*, of this Draft EIR, impacts under the proposed project to public services were found to be less than significant, and no mitigation measures are required.

The No Project Alternative would result in fewer new residents and jobs in the EIR Study Area, and, therefore, would result in a lower level of demand on the public service providers that serve the EIR Study Area. Potential future development under the No Project Alternative would be required to comply with all existing City regulations adopted to ensure that development pays its fair share of the cost of delivering services and providing libraries, while payment of property taxes would ensure that future development pays its fair share towards schools.

Overall, impacts under the No Project Alternative would be slightly ***lessened*** than those of the proposed project.

5.5.2.15 TRANSPORTATION

As described in Chapter 4.15, *Transportation*, of this Draft EIR, the proposed project would result in less-than-significant transportation impacts and no mitigation measures are required.

Like the proposed project, the No Project Alternative would be subject to the same federal, State, and local City design standards to ensure that future development does not increase hazards due to a geometric design feature or incompatible uses, and that development provides adequate emergency access. Therefore, the No Project Alternative would have a similar impact when compared to the proposed project in terms of transportation safety.

[2] The updated *Plan Bay Area 2050* does not provide growth projections at the city level to enable comparison to local plans.

The proposed project would focus potential future development in the ten General Plan Land Use Study Areas. As such, the VMT generated by potential future development under the proposed project would be lower than if development were proposed in areas not served by public transportation and a network of sidewalks and bicycle facilities. As described in Chapter 4.15, *Transportation*, VMT per capita and VMT per employee would be lower under the proposed project than existing 2020 conditions (14.6 VMT per capita compared to the existing 2020 conditions of 16.0 VMT per capita, and 15.3 VMT per employee compared to existing 2020 conditions of 16.4 VMT per employee). This reduction is due to focusing future development under the proposed project near public transit. The No Project Alternative would not include the new and modified goals, policies, or actions in the proposed General Plan 2040 that aim to concentrate development in the ten General Plan Land Use Study Areas and would thereby lessen the benefits gained from siting future development near public transit and existing services to reduce VMT. Therefore, it is expected that the No Project Alternative would result in greater VMT impacts when compared to the proposed project.

In summary, overall impacts from transportation under the No Project Alternative would be *greater* when compared to the proposed project because VMT would be greater under the No Project Alternative and the net benefits of new and modified General Plan 2040 goals, policies, and actions that reduce VMT would not be realized.

5.5.2.16 TRIBAL CULTURAL RESOURCES

As described in Chapter 4.16, *Tribal Cultural Resources*, of this Draft EIR, the proposed project would result in less-than-significant impacts to tribal cultural resources and no mitigation measures are required.

Under the No Project Alternative, new development would continue throughout the EIR Study Area under existing plans and regulations. As under the proposed project, existing archaeological resources, including Native American artifacts and human remains, present in the EIR Study Area, could be affected by construction activities under the No Project Alternative. Like the proposed project, the No Project Alternative would be subject to the same federal, State, and local regulations to mitigate impacts to tribal cultural resources, such as those in the Public Resources Code, California Health and Safety Code, and the California Code of Regulations. Because less development would occur under the No Project Alternative, the potential to impact these resources during construction would be lessened when compared to the proposed project.

The proposed project includes new and modified General Plan goals, policies, and actions that require additional considerations that would further protect tribal cultural resources in the EIR Study Area. Under the No Project Alternative, these goals, policies, and actions would not be adopted.

Overall, the No Project Alternative would have *similar* impacts to tribal cultural resources as compared to the proposed project when following common protocols.

5.5.2.17 UTILITIES AND SERVICE SYSTEMS

As described in Chapter 4.17, *Utilities and Service Systems*, of this Draft EIR, impacts to water, wastewater, solid waste, stormwater, and energy infrastructure under the proposed project were found to be less than significant with the compliance of all applicable regulations. No mitigation measures are required.

Demand and consumption trends generally demonstrate that advances in recycling and solid waste reduction requirements, water-efficient regulations in building and landscaping, and stricter stormwater retention requirements would reduce utility and service systems demands from existing conditions, or result in more efficient use of utilities. These trends would continue under both the proposed project and the No Project Alternative. Much like the proposed project, the No Project Alternative would connect to existing systems already in place and would be subject to the same existing federal, State, and local regulations related to utility usage. However, the proposed project includes new and modified General Plan 2040 goals, policies, and actions related to utilities to further minimize impacts, including policies to ensure increased water efficiency, implement the recently approved Sewer System Management Plan, encourage low impact development, and increased coordination with water suppliers in water supply planning efforts.

Overall, although the No Project Alternative would result in less development, impacts under the No Project Alternative would be *greater* when compared to the proposed project.

5.5.2.18 WILDFIRE

As described in Chapter 4.18, *Wildfire*, of this Draft EIR, the proposed project would result in significant and unavoidable project-level and cumulative impacts due to development under the proposed project increasing population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.

Although the goals, policies, and actions identified in the proposed General Plan 2040 provide the best wildfire hazard reduction measures available, the majority of western San Mateo is in a Very High Fire Hazard Severity Zone (VHFHSZ) and/or the Wildland Urban Interface (WUI). Prohibiting new development in this portion of San Mateo is not feasible or practical because the City has a responsibility to meet other, conflicting obligations, including increasing the number and type of housing available and allowing reconstruction of homes burned by wildfires. While the No Project Alternative would result in less development, the No Project Alternative would not adopt the new and modified goals, policies, or actions of the proposed General Plan, and development would still occur in the VHFHSZ and/or the WUI. Therefore, implementation of the No Project Alternative would have *similar* impacts when compared to the proposed project.

5.5.3 RELATIONSHIP OF THE ALTERNATIVES TO THE OBJECTIVES

As listed in Section 5.2, *Project Objectives,* the primary purposes of the proposed project are to plan for the growth and conservation of San Mateo over a 20-year time horizon. This requires extending the buildout horizon to year 2040 and updating goals, policies, and actions so that they meet current State

requirements and community priorities. The objectives also include identifying the location and allowed density and intensity of San Mateo's land use; planning for future circulation and infrastructure improvements; identifying sufficient residential land to meet the current and future housing needs; protecting natural resources and preserving and improving open space; protecting residents from harmful or disruptive levels of noise; keeping the community safe from natural and human-caused hazards; and improving the safety and quality of life for residents of neighborhoods that face a combination of both higher-than-average pollution exposure and social and economic challenges.

Under the No Project Alternative, the proposed project would not be implemented, and the proposed goals, policies, and actions intended to address objectives would not be adopted. Therefore, this alternative would not fully accomplish any of the project objectives.

5.6 REDUCED TRAFFIC NOISE ALTERNATIVE

5.6.1 DESCRIPTION

The purpose of the Reduced Traffic Noise Alternative is to reduce significant and unavoidable impacts associated with traffic noise.

As described in Chapter 4.11, *Noise*, buildout under the proposed project based on modeling conducted for this EIR shows an increase above acceptable levels over existing conditions along one roadway segment. The Reduced Traffic Noise Alternative would involve enhanced transportation demand management (TDM) measures to reduce vehicle travel to a greater extent than under the proposed project. Specifically, it is assumed that this alternative would involve a new TDM program applicable to new development as well as existing residences, employees, and businesses. New TDM requirements may include a combination of the following, or similar, measures for employees and residents:

- Transit passes and subsidies
- E-bike subsidies
- Ride sharing subsidies
- Free bicycles

In addition, this alternative would involve increased funding allocations to fully implement the City's Bicycle Master Plan and Pedestrian Master Plan as expeditiously as possible, in order to provide expanded and safer alternatives to driving and encourage higher participation in TDM initiatives.

The Reduced Traffic Noise Alternative would accommodate the same amount of proposed development as the proposed project and would involve the same proposed General Plan land use map, designations, goals, policies, and actions. This alternative would also include the same technical update to the City's 2020 CAP that would occur under the proposed project.

The alternatives analysis assumes that all applicable mitigation measures recommended for the proposed project would apply to the Reduced Traffic Noise Alternative.

5.6.2 IMPACT DISCUSSION

The potential environmental impacts associated with the Reduced Traffic Noise Alternative when compared to the proposed project are described herein.

5.6.2.1 AESTHETICS

As described in Chapter 4.1, *Aesthetics*, of this Draft EIR, the proposed project would not result in any significant impacts related to aesthetics and no mitigation measures are required.

The Reduced Traffic Noise Alternative would involve the same growth potential and land use pattern as would occur under the proposed project. As under the proposed project, potential future development under the Reduced Traffic Noise Alternative would be anticipated to occur in the ten General Plan Land Use Study Areas where future development would have a lesser impact on scenic vistas. Furthermore, there are no officially designated scenic view corridors, vistas, or State-designated scenic highways within, or in the vicinity of, the EIR Study Area. Like the proposed project, applicable future projects under the Reduced Traffic Noise Alternative would be subject to design review prior to project approval pursuant to *San Mateo Design Guidelines* and compliance with the various planning documents that govern scenic quality in the city, as described in Section 4.1.1.1, *Regulatory Framework*, in Chapter 4.1. Therefore, overall impacts to scenic corridors, vistas, and highways would be similar under both the proposed project and the Reduced Traffic Noise Alternative.

The Reduced Traffic Noise Alternative, like the proposed project, would benefit from the new and modified General Plan goals, policies, and actions and would be required to comply with best management practices in CALGreen and SMMC provisions that ensure new land uses do not generate excessive light levels and that future development reduce light and glare spillover to surrounding land uses. Therefore, impacts from light and glare under the Reduced Traffic Noise Alternative would be similar when compared to the proposed project.

The Reduced Traffic Alternative would not propose any changes from the proposed project that would affect aesthetic impacts. The Reduced Traffic Alternative is focused on TDM measures, such as transit passes and subsidies, e-bike subsidies, and free bicycles. None of these measures would affect aesthetic resources. Under the Reduced Traffic Noise Alternative, the same level of development would occur in the same concentrated areas as the proposed project and would be guided by the same regulations. Therefore, the Reduced Traffic Noise Alternative would result in *similar* aesthetics impacts when compared to the proposed project.

5.6.2.2 AIR QUALITY

As described in Chapter 4.2, *Air Quality*, of this Draft EIR, the proposed project would result in significant and unavoidable impacts during the construction and operational phases even with implementation of Mitigation Measures AQ-2, AQ-3, and AQ-4.

Similar to the proposed project, implementation of the Reduced Traffic Noise Alternative would not conflict with the BAAQMD Clean Air Plan or generate any substantial odors.

The Reduced Traffic Noise Alternative would include development as allowed under the proposed project but would involve enhanced TDM requirements applicable to new development as well as existing residences, employees, and businesses. Through the new TDM program, vehicle traffic, a major source of criteria air pollutants, would be reduced. Therefore, impacts would be lessened when compared to the proposed project.

Under the Reduced Traffic Noise Alternative, the proposed CAP update would be adopted and, as under the proposed project, would be consistent with the BAAQMD's 2017 Clean Air Plan's goal to reduce GHG emissions and protect the climate.

Overall, because the Reduced Traffic Noise Alternative would result in less vehicle traffic, air quality impacts under the Reduced Traffic Noise Alternative would be *lessened* when compared to the proposed project.

5.6.2.3 BIOLOGICAL RESOURCES

As described in Chapter 4.3, *Biological Resources*, of this Draft EIR, the proposed project would result in less-than-significant impacts to biological resources and no mitigation measures are required.

The Reduced Traffic Noise Alternative would involve the same growth potential and land use pattern as would occur under the proposed project. Potential future development would still be anticipated to occur in the ten General Plan Land Use Study Areas where future development would have a lesser impact on biological resources. Like the proposed project, adherence to the new and modified goals, policies, and actions of the proposed General Plan 2040 as well as all federal, State, and local regulations relating to biological resources would reduce effects to biological resources under the Reduced Traffic Noise Alternative. Therefore, the Reduced Traffic Noise Alternative would have a *similar* level of impact as the proposed project.

5.6.2.4 CULTURAL TRIBAL RESOURCES

As described in Chapter 4.4, *Cultural Tribal Resources*, of this Draft EIR, the proposed project would result in less-than-significant impacts to cultural resources and no mitigation measures are required.

The Reduced Traffic Noise Alternative would involve the same growth potential and land use pattern as would occur under the proposed project. Therefore, under both the proposed project and the Reduced Traffic Noise Alternative, the same resources would have the potential to be affected by construction activities. Like the proposed project, the Reduced Traffic Noise Alternative would be subject to the same federal, State, and local regulations to mitigate impacts to cultural resources, such as those in the Public Resources Code, California Health and Safety Code, and the California Code of Regulations. The proposed General Plan 2040 new and modified goals, policies, and actions that require additional considerations to further protect historic and archaeological resources in the EIR Study Area would also be implemented under this alternative. Therefore, the Reduced Traffic Noise Alternative would have *similar* impacts to cultural resources when compared to the proposed project.

5.6.2.5 ENERGY

As described in Chapter 4.5, *Energy*, of this Draft EIR, the proposed project would not result in any significant impacts related to energy and no mitigation measures are required.

All development that occurs in the State is required to comply with best management practices regulated in the California Green Building Code and Building and Energy Efficiency Standards, which ensure new development would not result in the wasteful or inefficient use of energy. Additionally, neither the proposed project nor the Reduced Traffic Noise Alternative would introduce a level of development and population growth that would be anticipated to necessitate the construction of new energy supply facilities or transmission infrastructure.

Furthermore, the Reduced Traffic Noise Alternative, like the proposed project, would include new and modified General Plan goals, policies, and actions that would further ensure energy efficiency in the EIR Study Area. These include enhanced TDM requirements applicable to new development as well as existing residences, employees, and businesses. Through the new TDM program, vehicle traffic and VMT would be reduced when compared to the proposed project. Because transportation is a leading source of energy use in San Mateo, these new and modified goals, policies, and actions promote energy conservation from the transportation sector by increasing safe and sufficient transit, bicycle, and pedestrian facilities to reduce automobile use and VMT.

The same amount of development would occur under the Reduced Traffic Noise Alternative, so energy consumption from construction would be similar when compared to the proposed project. Energy use from VMT would be lessened under the Reduced Traffic Noise Alternative with implementation of enhanced TDM requirements.

Under the Reduced Traffic Noise Alternative, the proposed CAP update would be adopted and would contribute toward minimizing inefficient, wasteful, or unnecessary transportation energy consumption, and ensure compliance with State, regional, or local plans for renewable energy.

Overall, energy related impacts would be *lessened* under the Reduced Traffic Noise Alternative when compared to the proposed project due to the reduced energy usage for transportation.

5.6.2.6 GEOLOGY AND SOILS

As described in Chapter 4.6, *Geology and Soils*, of this Draft EIR, the proposed project would result in less-than-significant impacts related to geology and soils and no mitigation measures are required.

Future development under both the proposed project and the Reduced Traffic Noise Alternative would be concentrated in the ten General Plan Land Use Study Areas and would be subject to the same federal, State, and local regulations that address and prevent hazards associated with geology, soils, and seismicity. The Reduced Traffic Noise Alternative would result in the same overall development and compliance with existing regulations related to geologic and seismic safety would apply similarly to both future development under the Reduced Traffic Noise Alternative and the proposed project.

Therefore, geological impacts of the Reduced Traffic Noise Alternative would be *similar* when compared to the proposed project.

5.6.2.7 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.7, *Greenhouse Gas Emissions*, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required when applying program-level thresholds for the forecast year 2040.

New buildings constructed under both the proposed project and the Reduced Traffic Noise Alternative would be subject to the triennial updates to California's Building and Energy Efficiency Standards, which would presumably become more stringent over time. Energy usage due to construction of future development projects under the Reduced Traffic Noise Alternative would be similar to those of the proposed project.

The Reduced Traffic Noise Alternative would adopt the same goals, policies, and actions as the proposed project. However, unlike the proposed project, the Reduced Traffic Noise Alternative would introduce enhanced TDM requirements applicable to new development as well as existing residences, employees, and businesses. Through the new TDM program, vehicle traffic and VMT would be reduced, which in turn would decrease GHG emissions.

Under the Reduced Traffic Noise Alternative, the proposed CAP update would be adopted and, as under the proposed project, would include a new forecast for 2045, consistent with Assembly Bill 1279, which directs a minimum statewide reduction of GHGs to at least 85 percent below 1990 levels by 2045.

Overall, because the Reduced Traffic Noise Alternative would reduce GHG emissions from vehicle travel, impacts would be *lessened* when compared to the proposed project.

5.6.2.8 HAZARDS AND HAZARDOUS MATERIALS

As described in Chapter 4.8, *Hazards and Hazardous Materials*, of this Draft EIR, the proposed project would result in less-than-significant impacts related to hazards and hazardous materials and no mitigation measures are required.

Potential future development that could occur in the EIR Study Area from implementation of both the proposed project and the Reduced Traffic Noise Alternative would be required to comply with all federal, State, and local regulations pertaining to hazards and hazardous materials. Like the proposed project, the Reduced Traffic Noise Alternative would implement new and modified General Plan 2040 goals, policies, and actions that would further reduce impacts related to hazardous materials, airport-related noise, and emergency evacuation plans. Therefore, the Reduced Traffic Noise Alternative would have a *similar* impact when compared to the proposed project.

5.6.2.9 HYDROLOGY AND WATER QUALITY

As described in Chapter 4.9, *Hydrology and Water Quality,* of this Draft EIR, the proposed project would not result in any significant impacts related to hydrology and water quality and no mitigation measures are required. Compliance with existing State and local regulations and procedures would ensure that pre- and post-construction impacts to water quality would be less than significant.

Similar to the proposed project, future development under the Reduced Traffic Noise Alternative would occur within previously urbanized areas and connect to existing drainage systems already in place. The Reduced Traffic Noise Alterative would be subject to the same existing federal, State, and local regulations relating to hydrology and water quality as the proposed project. Compliance with existing regulations would ensure that pre- and post-construction impacts to water quality are minimized as future development occurs. Additionally, future development under the Reduced Traffic Noise Alternative would be subject to the new and modified General Plan 2040 goals, policies, and actions related to hydrology and water quality to further minimize impacts.

Overall, hydrology and water quality impacts would be *similar* to those of the proposed project.

5.6.2.10 LAND USE AND PLANNING

As described in Chapter 4.10, *Land Use and Planning*, of this Draft EIR, the proposed project would not result in any significant impacts related to land use and planning and no mitigation measures are required.

The Reduced Traffic Noise Alternative would involve the same growth potential and land use pattern as would occur under the proposed project. Both the proposed project and the Reduced Traffic Noise Alternative would aim to improve connectivity and integrate infill development, and they would not create physical barriers within existing communities. Accordingly, impacts related to the division of an established community would be similar under both the proposed project and the Reduced Traffic Noise Alternative.

Under the Reduced Traffic Noise Alternative, development would be concentrated in the ten General Plan Land Use Study Areas and implementation of the Reduced Traffic Noise Alternative would not conflict with any applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect. The Reduced Traffic Noise Alternative would implement the same new and modified General Plan 2040 goals, policies, or actions, and would involve additional TDM measures to further reduce VMT. Therefore, as under the proposed project, the Reduced Traffic Noise Alternative would achieve a greater level of consistency with the intent of *Plan Bay Area 2050*, which provides a framework for future development in the Bay Area to meet the State's GHG and VMT reduction goals through the concentration of development in downtowns and centers near jobs and services. Therefore, overall land use and planning impacts under the Reduced Traffic Noise Alternative would be *lessened* when compared to the proposed project**.**

5.6.2.11 NOISE

As described in Chapter 4.11, *Noise*, of this Draft EIR, the proposed project would result in significant and unavoidable project-level and cumulative impacts due to a modeled traffic noise increase of more than 5.0 dBA Ldn over existing conditions along one roadway segment within the EIR Study Area.

Future development allowed under the proposed project would be subject to the standards of the SMMC as well as the new and modified goals, policies, and actions of the proposed General Plan 2040, including those relating to the interface between residential and nonresidential land uses. As specific uses are proposed for particular sites, project-level design, permitting, and/or environmental review would serve to ensure that individual uses would comply with the noise regulations. Future development under the Reduced Traffic Noise Alternative would also be subject to these applicable standards. Construction-related noise and vibration impacts would be similar under both the proposed project and the Reduced Traffic Noise Alternative.

However, unlike the proposed project, the Reduced Traffic Noise Alternative would introduce enhanced TDM requirements applicable to new development as well as existing residences, employees, and businesses. Through the new TDM program, vehicle traffic would be reduced, which in turn would reduce traffic noise. Therefore, impacts would be lessened when compared to the proposed project.

Because the Reduced Traffic Noise Alternative would introduce enhanced TDM requirements to reduce traffic noise, noise impacts under this alternative would be *lessened* when compared to the proposed project.

5.6.2.12 PARKS AND RECREACTION

As discussed in Chapter 4.12, *Parks and Recreation*, of this Draft EIR, the proposed project would not result in any significant impacts related to parks and recreation, and no mitigation measures are required.

The Reduced Traffic Noise Alternative does not propose any changes that would result in substantial differences from the growth potential of the proposed project and would therefore result in similar demand on the parks and recreation facilities that serve the EIR Study Area. Like the proposed project, potential future development under the No Project Alternative would be required to comply with all existing City regulations adopted to ensure that development either provides parkland or pay in-lieu fees for the City to dedicate parkland elsewhere. Therefore, impacts under the Reduced Traffic Noise Alternative would be *similar* when compared to the proposed project.

5.6.2.13 POPULATION AND HOUSING

As described in Chapter 4.13, *Population and Housing*, of this Draft EIR, the proposed project would not result in any significant impacts related to population and housing, and no mitigation measures are required. As described in Chapter 4.13, the proposed project would exceed the projections in *Plan Bay Area 2040* for San Mateo but would generally be in line with county-level projections in *Plan Bay Area 2050*.

The Reduced Traffic Noise Alternative would involve the same growth potential as would occur under the proposed project. The Reduced Traffic Noise Alternative would include the updated policy framework of the proposed project, which ensures adequate planning occurs to accommodate the future population increase and future development. Therefore, impacts would be similar under both the proposed project and the Reduced Traffic Noise Alternative.

As under the proposed project, implementation of the Reduced Traffic Noise Alternative would result in a net increase in housing; therefore, it would not require replacement housing outside of the EIR Study Area. Therefore, potential impacts associated with displacement under the Reduced Traffic Noise Alternative would be similar when compared to those of the proposed project.

In summary, the Reduced Traffic Noise Alternative would result in the same growth potential as the proposed project and impacts related to population and housing would be *similar* when compared to the proposed project.

5.6.2.14 PUBLIC SERVICES

As described in Chapter 4.14, *Public Services*, of this Draft EIR, impacts under the proposed project to public services were found to be less than significant, and no mitigation measures are required.

The Reduced Traffic Noise Alternative would involve the same growth potential as would occur under the proposed project and would therefore result in a similar level of demand on the public service providers that serve the EIR Study Area. Potential future development under the Reduced Traffic Noise Alternative would be required to comply with all existing City regulations adopted to ensure that development pays its fair share of the cost of delivering services and providing libraries, while payment of property taxes would ensure that future development pays its fair share towards schools. Overall, impacts under the Reduced Traffic Noise Alternative would be *similar* to those of the proposed project.

5.6.2.15 TRANSPORTATION

As described in Chapter 4.15, *Transportation*, of this Draft EIR, the proposed project would result in less-than-significant transportation impacts and no mitigation measures are required.

Like the proposed project, the Reduced Traffic Noise Alternative would be subject to the same federal, State, and local City design standards to ensure that future development does not increase hazards due to a geometric design feature or incompatible uses, and that development provides adequate emergency access. Therefore, the Reduced Traffic Noise Alternative would have a similar impact when compared to the proposed project in terms of transportation safety.

Much like the proposed project, the Reduced Traffic Noise Alternative would concentrate development in the ten General Plan Land Use Study Areas, and adopt the same General Plan goals, policies and actions as the proposed project. However, unlike the proposed project, the Reduced Traffic Noise Alternative would introduce enhanced TDM requirements applicable to new development as well as existing residences, employees, and businesses.

Through the new TDM program, vehicle traffic would be reduced, which in turn would reduce VMT. As a result of implementation, the Reduced Traffic Noise Alternative would result in *lessened* transportation impacts when compared to the proposed project.

5.6.2.16 TRIBAL CULTURAL RESOURCES

As described in Chapter 4.16, *Tribal Cultural Resources*, of this Draft EIR, the proposed project would result in less-than-significant impacts to tribal cultural resources and no mitigation measures are required.

The Reduced Traffic Noise Alternative would involve the same growth potential and land use pattern as would occur under the proposed project. As under the proposed project, existing archaeological resources, including Native American artifacts and human remains, present in the EIR Study Area, could be affected by construction activities under the Reduced Traffic Noise Alternative. Like the proposed project, the Reduced Traffic Noise Alternative would be subject to the same federal, State, and local regulations to mitigate impacts to tribal cultural resources, such as those in the Public Resources Code, California Health and Safety Code, and the California Code of Regulations.

The Reduced Traffic Noise Alternative would implement the same new and modified General Plan goals, policies, and actions that require additional considerations to further protect tribal cultural resources in the EIR Study Area as the proposed project. Therefore, the Reduced Traffic Noise Alternative would have *similar* impacts to tribal cultural resources as compared to the proposed project.

5.6.2.17 UTILITIES AND SERVICE SYSTEMS

As described in Chapter 4.17, *Utilities and Service Systems*, of this Draft EIR, impacts to water, wastewater, solid waste, stormwater, and energy infrastructure under the proposed project were found to be less than significant with the compliance of all applicable regulations. No mitigation measures are required.

Demand and consumption trends generally demonstrate that advances in recycling and solid waste reduction requirements, water-efficient regulations in building and landscaping, and stricter stormwater retention requirements would reduce utility and service systems demands from existing conditions, resulting in a more efficient use of utilities. Because the Reduced Traffic Noise Alternative would involve the same growth potential and land use pattern as would occur under the proposed project, similar utility and service system usage and demand would occur. In addition, the Reduced Traffic Noise Alternative includes the new and modified General Plan 2040 goals, policies, and actions of the proposed project related to utilities to further minimize impacts, including policies to ensure increased coordination with water suppliers and water supply planning efforts. Therefore, impacts under the Reduced Traffic Noise Alternative would be *similar* when compared to the proposed project.

5.6.2.18 WILDFIRE

As described in Chapter 4.18, *Wildfire*, of this Draft EIR, the proposed project would result in significant and unavoidable project-level and cumulative impacts due to development under the proposed project

increasing population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.

The Reduced Traffic Noise Alternative would involve the same growth potential and land use pattern as would occur under the proposed project. Like the proposed project, the Reduced Traffic Noise would implement the same new and modified General Plan goals, actions, and policies that would serve to reduce wildfire impacts. Therefore, the Reduced Traffic Noise Alternative would have *similar* wildfire impacts as the proposed project.

5.6.3 RELATIONSHIP OF THE ALTERNATIVES TO THE OBJECTIVES

The Reduced Traffic Noise Alternative would involve the same proposed goals, policies, and actions of the proposed project intended to address the project objectives. In addition, this alternative would include enhanced TDM requirements to reduce vehicle traffic, in turn reducing criteria air pollutants, GHG emissions, and traffic noise. Therefore, the Reduced Traffic Noise Alternative would fully achieve all the project objectives, and would more fully meet the following objectives when compared to the proposed project:

- Protect natural resources, such as water, air, trees, and hillsides, and preserve and improve open spaces, including open space for recreation, for habitat, or for public health and safety.
- Protect residents from harmful or disruptive levels of noise.
- Improve the safety and quality of life for residents of neighborhoods that face a combination of both higher-than-average pollution exposure and social and economic challenges such as low incomes, language barriers, or housing instability (Equity Priority Areas).

5.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, Section 15126.6 of the 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 to the proposed project that would be expected to generate the least number of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative to the proposed project selected may not be the alternative to the proposed project that best meets the goals or needs of San Mateo. Because CEQA Guidelines Section 15126.6(c) requires an evaluation of a reasonable range of alternatives to the proposed project, the proposed project under consideration cannot be identified as the environmentally superior alternative. Additionally, in accordance with CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

As shown in Table 5-2, *Comparison of Impacts of the Proposed Project and Project Alternatives*, the Reduced Traffic Noise Alternative would, in comparison to the proposed project, result in lessened environmental impacts related to air quality, energy, GHG emissions, land use and planning, noise, and

transportation, and would not result in greater impacts for any resource categories. Therefore, as shown in Table 5-2, the Reduced Traffic Noise Alternative would be the environmentally superior alternative.