

**Sent:** Tuesday, September 19, 2023 11:17 AM

**To:** Manira Sandhir <[msandhir@cityofsanmateo.org](mailto:msandhir@cityofsanmateo.org)>

**Cc:** Zachary Dahl <[zdahl@cityofsanmateo.org](mailto:zdahl@cityofsanmateo.org)>; Alex Khojikian <[akhojikian@cityofsanmateo.org](mailto:akhojikian@cityofsanmateo.org)>; City Mgr <[citymgr@cityofsanmateo.org](mailto:citymgr@cityofsanmateo.org)>

**Subject:** San Mateo General Plan Draft EIR, Project Alternatives

Hi Manira,

Attached please find my letter regarding the San Mateo General Plan Draft EIR. The focus of the letter is the absence of "reasonable" alternatives as required by CEQA.

Although Alex is not directly involved in the EIR process, I have copied him on this email because the lack of reasonable alternatives has a "thumb on the scale" effect regarding Measure Y and the clear preference of voters for moderate growth.

Thank you for the opportunity to comment on the DEIR.

Keith Weber

San Mateo

September 19, 2023

**TO:** Manira Sandhir, Planning Manager  
**CC:** Zachary Dahl, Interim Community Development Director  
Alex Khojikian, City Manager

**FROM:** Keith Weber

**SUBJECT:** San Mateo General Plan Draft EIR, Project Alternatives

Dear Ms. Sandhir,

The Draft EIR (DEIR) for the 2040 Draft General Plan is inadequate and incomplete because it fails to evaluate a “reasonable range” of alternatives as required by CEQA.

During the public outreach phase of the General Plan, the City identified four feasible alternatives: the “No Project” alternative plus three others (Alternatives A, B, and C), each with incrementally greater growth potential and impacts. All four alternatives met or exceeded the housing and economic growth objectives of the General Plan revision. The City Council chose the alternative with the maximum development potential as their preferred alternative (the “project”).

The California Environmental Quality Act (CEQA) requires the analysis of a “range of reasonable alternatives to 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.”

The Draft EIR evaluates only two alternatives:

1. No Project
2. Reduced Traffic Noise Alternative, which, according to the EIR, “would accommodate the same amount of proposed development as the proposed project.”

CEQA considers alternatives to involve changes to the project’s “scope, design, extent,” and “intensity.” But, the DEIR fails to offer alternatives that address these possible changes. Instead, it gives us the same amount of development as the project - an alternative in name only. By disregarding the less impactful alternatives offered to the public and preferred by much of the citizenry, the DEIR provides an all-or-nothing choice between maximum buildout or no project at all. The clear message voters sent to City Hall with the passage of Measure Y is their wish to accommodate moderate growth - to find a compromise between extreme growth and no growth. The DEIR is a tone deaf failure in this regard, presenting the public with only a choice between two extremes.

One of the purposes of an EIR is to identify alternatives to a proposed project and evaluate the comparative merits of feasible alternatives. Instead of providing the public with seriously considered alternatives, the DEIR offers a Sophie’s choice. CEQA requires more and the public deserves better.

In order to satisfy the CEQA requirement that “an EIR shall describe a range of reasonable alternatives to the project,” **the feasible alternatives previously identified publicly as Alternatives A and B, must be evaluated and the Draft EIR recirculated** for it to meet the threshold of adequacy demanded by CEQA and expected by the public. The additional alternatives analysis represents significant new information and therefore requires recirculation of the Draft EIR, as explained in CEQA Guidelines Section 15088.5. RECIRCULATION OF AN EIR PRIOR TO CERTIFICATION.