CHAPTER 5
Alternatives

5.1 Introduction

CEQA Guidelines Section 15126.6(a) requires an analysis of project alternatives, stating: "An EIR shall 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."

The City's goal in defining the range of alternatives is to select those alternatives that would avoid or substantially lessen the significant impacts of the project and feasibly attain most of the basic project objectives. Accordingly, this chapter describes the legal requirements and methodology used to select alternatives to the proposed project, which includes the project objectives identified in Chapter 2, *Project Description*, and the significant impacts of the project identified in Chapter 3, *Environmental Setting, Impacts, and Mitigation*. The subsequent sections discuss potential alternatives that were considered but were not selected for in-depth analysis, and the basis for selecting specific alternatives over others and, finally, prepared a comparative analysis of these selected alternatives.

After the analysis of five selected alternatives—which compares the impacts of those alternatives to the impacts of the proposed project—this chapter concludes with a matrix comparing the project to all five alternatives analyzed in this chapter and a discussion of the "environmentally superior" alternative.

5.1.1 Requirements for Alternatives Analysis

CEQA, the CEQA Guidelines, and the case law on the subject have established a comprehensive framework for the identification and analysis of alternatives to the proposed project in an EIR. CEQA Guidelines Section 15126.6(a) states that an EIR must describe and evaluate a reasonable range of alternatives to the proposed project that would feasibly attain most of the project's basic objectives, but that would avoid or substantially lessen any identified significant adverse environmental effects of the project. An EIR is not required to consider every conceivable alternative to a proposed project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. The EIR must evaluate the comparative merits of the alternatives and include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.

CEQA Guidelines Section 15126.6(b) provides guidance regarding the topics that the alternatives analysis should consider, stating that "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."

The term "feasibility" is relevant to the selection of alternatives because of the requirement that the alternatives "feasibly attain most of the basic objectives of the project," and because the range of alternatives must be "potentially feasible" (CEQA Guidelines Section 15126.6(a)). CEQA Guidelines Section 15364 defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." CEQA Guidelines Section 15126.6(f)(1) lists the following factors that may be taken into account when addressing the feasibility of alternatives:

- Site suitability
- Economic viability
- Availability of infrastructure
- General plan consistency
- Other plans or regulatory limitations
- Jurisdictional boundaries (projects with a regionally significant impact should consider the regional context)
- Whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent)

The CEQA Guidelines set forth the following additional criteria for selecting and evaluating alternatives:

- The range of alternatives is to be governed by the "rule of reason." CEQA requires that only those alternatives necessary to "permit a reasoned choice" be included, and that the range shall be limited to alternatives that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making (see CEQA Guidelines Section 15126.6(f)).
- The specific alternative of 'no project' shall also be evaluated along with its impact. When the proposed project is "a development project on identifiable property, the 'no project' alternative is the circumstance under which the project does not proceed." This is the case for the proposed project addressed in this EIR (see CEQA Guidelines Section 15126.6(e)).
- Alternative locations for the project are to be considered where any of the significant effects of the project could be avoided or substantially lessened by putting the project in another location (see CEQA Guidelines Section 15126.6(f)(2)(A)).
- 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 determination (see CEQA Guidelines Section 15126.6(c)).

- Finally, an EIR need not consider alternatives for which the environmental effects cannot be reasonably ascertained and for which implementation is remote and speculative (see CEQA Guidelines Section 15126.6(f)(3)).

5.2 Project Objectives

Pursuant to CEQA Guidelines Section 151`, the EIR must include a statement of objectives, including the underlying purpose of the project. As listed in Chapter 2, Section 2.14, *Project Objectives*, the City and the project applicant seek to achieve the following objectives by undertaking the proposed project:

5.2.1 Project Applicant Objectives

By undertaking the proposed project, the project applicant, Google LLC, seeks to achieve the objectives listed below.

Overarching Objectives

- The project applicant's key objective is to provide sufficient high-quality office space to accommodate the long-term expansion of its workforce and business operations in a Bay Area location that is anchored by public transportation.
- Deliver community benefits consistent with the terms of the MOU.
- Provide this new office space in a vibrant mixed-use neighborhood centered around Diridon Station that includes not only new workplaces, but also housing and active commercial and open spaces with the amenities and services necessary to support a diverse, thriving community of residents and workers.

Establish Diridon Station as a New Regional Job Center

- Deliver a critical mass of new office space consistent with the goals and objectives of the Diridon Station Area Plan.
- Encourage a significant shift to public transportation by leveraging existing and planned local, regional, and statewide transportation facilities at the site by developing a high-density mix of office and residential uses.
- Create a dense commercial center that is designed to anticipate and adapt to changing business needs and growth over several decades, with floorplates large enough to provide horizontally connected workplaces.
- Group office uses contiguously while creating a mixed-use environment in order to take advantage of operational efficiencies, such as the ability to share amenity spaces.

Develop Housing, Including Affordable Housing, Alongside Jobs

- Deliver thousands of units of new, high-quality housing.
- Construct housing with sufficient density to maintain day and evening, weekday and weekend activities in Downtown West.

- Offer a mix of unit types, sizes, and levels of affordability to accommodate a range of potential residents.
- Deliver affordable housing consistent with the goals set forth in the MOU.

Create Opportunity Pathways

- Develop commercial retail spaces on the project site that would attract diverse tenants, adapt to future needs, integrate local small businesses, stimulate local economic activity, serve the neighborhood, and complement adjacent public spaces.
- Promote learning and career opportunities from retail, to food service, to professional and tech jobs.

Build a Place that is of San José

- Incorporate high-quality urban design, architecture, and open spaces with varied form, scale, and design character to enliven San José's downtown.
- Preserve and adapt landmark historic resources and assets where feasible to foster a place authentic to San José and foster contemporary relations to San José's history.
- Develop key public spaces at the core of the project site as an extension to Downtown.
- Build upon the project's location at the convergence of a significant regional and statewide transportation hub and the city's Downtown to create a world-class, architecturally iconic civic/cultural center for the City of San José, particularly through the combination and juxtaposition of historic and contemporary design elements.
- Optimize environmental performance and comfort within buildings and adjacent public spaces through orientation, massing, and building technology.
- Create a place that fosters arts and cultural uses, especially through the provision of dedicated spaces for the arts, and as part of a larger suite of community benefits.

Connect People to Nature and Transit

- Connect people with nature along Los Gatos Creek and the Guadalupe River.
- Create myriad opportunities for passive recreation in new public open spaces, while improving access to active recreation by significantly augmenting a multi-use trail.
- Improve pedestrian, bicycle, and transit connectivity within the project area, as well as between the project area and existing adjacent neighborhoods, in order to create a highly active and lively pedestrian and bicycle friendly environment.
- Consistent with the MOU, develop a project with minimal parking and robust Transportation Demand Management measures in order to encourage active transportation and public transit use, and to support implementation of the City's Climate Smart plan.
- Provide a model of 21st century sustainable urban development by implementing shared infrastructure and logistics systems across the project, significantly reducing energy and water demand, vehicle miles traveled, and greenhouse gas emissions.

Vibrant Public Realm

- Create a network of connected plazas, green spaces, streetscapes, and trails to link office and residential uses with retail, cultural, hotel, and other active uses and provide a range of publicly accessible amenities that create attractive, vibrant and safe experiences.

5.2.2 City Objectives

The City of San José seeks to achieve the following objectives by approving the proposed project:

- Ensure development of the project site consistent with policies in the General Plan, Downtown Strategy 2040, and Diridon Station Area Plan, that encourages ambitious job creation, promotes development of Downtown as a regional job center and a world-class urban destination, and supports transit ridership.
- Align the Diridon Station Area Plan with the Downtown Strategy 2040, specifically with regard to the increase in office development capacity.
- Ensure that development advances the City's progress toward the following goals and policies, as reflected in and implemented through the Downtown Strategy 2040 and Diridon Station Area Plan:
  - Manage land uses to enhance employment lands to improve the balance between jobs and workers residing in San José. To attain fiscal sustainability for the City, strive to achieve a minimum ratio of 1.1 jobs per employed resident by 2040. In the near term, strive to achieve a minimum ratio of 1 job per employed resident by 2025. (General Plan Policy IE-1.4)
  - Promote the intensification of employment activities on sites in close proximity to transit facilities and other existing infrastructure, in particular within the Downtown, North San José, the Berryessa International Business Park, and Edenvale. (General Plan Policy IE-1.5)
  - Advance the Diridon Station Area as a world-class transit hub and key transportation center for Northern California. (General Plan Policy IE-1.7)
  - Foster development patterns that will achieve a complete community in San José, particularly with respect to increasing jobs and economic development and increasing the City's jobs-to-employed resident ratio while recognizing the importance of housing a resident workforce. (General Plan Policy LU-1.1)
  - Provide maximum flexibility in mixing uses throughout the Downtown area. Support intensive employment, entertainment, cultural, public/quasi-public, and residential uses in compact, denser forms to maximize social interaction; to serve as a focal point for residents, businesses, and visitors; and to further the Vision of the *Envision General Plan*. (General Plan Policy LU-3.1)

5.2.3 Objectives of the City and Google Memorandum of Understanding

- Implement the vision statement in the MOU dated December 4, 2018, by (1) creating a vibrant, welcoming, and accessible urban destination on the project site consisting of land uses that are well-integrated with the intermodal transit station, adjacent neighborhoods, and Downtown; (2) demonstrating a commitment to place making, social equity,

economic development, environmental sustainability, and financially viable private development; and (3) collaborating with the project applicant to innovate in the development of an urban destination that will bring opportunity to the local community and create new models for urban and workplace design and development.

- Deliver community benefits consistent including, but not limited to, achieving the following goals in the MOU:
  - Grow and preserve housing, including affordable housing.
  - Create broad job opportunities for San José residents of all skill and educational levels.
  - Enhance and connect the public realm.
  - Pay construction workers a prevailing hourly wage and benefit rate for Office and Research and Development building construction.
  - Increase access to quality education, enrichment opportunities, internships, and pathways to careers in science, technology, engineering, and mathematics (STEM) fields.
  - Support the timely delivery of substantial jobs and housing in the area surrounding Diridon Station to maximize integration with planned transit projects and successful implementation of the Diridon Station Area Plan.
- Support San José's economic growth by adding economic vitality to downtown and enhancing the property tax base.

5.3 Significant Impacts of the Proposed Project

5.3.1 Significant and Unavoidable Impacts

As stated above, a focus of the discussion of alternatives is to determine whether there are potentially feasible alternatives that could avoid or substantially lessen the significant impacts of the proposed project. As discussed in Chapter 4, Section 4.2, *Significant and Unavoidable Impacts*, the proposed project would result in the following significant unavoidable impacts related to air quality, historic architectural resources, land use, noise, and population and housing.

Air Quality

Impact AQ-2: The proposed project would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

- Implementing Mitigation Measures AQ-2a, Construction Emissions Minimization Plan; AQ-2b, Construction Equipment Maintenance and Tuning; AQ-2c, Heavy-Duty Truck Model Year Requirement; AQ-2d, Super-Compliant VOC Architectural Coatings during Operations; AQ-2e, Best Available Emissions Controls for Stationary Emergency Generators; AQ-2f, Operational Diesel Truck Emission Reduction; AQ-2g, Electric Vehicle Charging; and AQ-2h, Enhanced Transportation Demand Management Program, would reduce the severity of the impact, but not to a less-than-significant level.

Impact AQ-3: The proposed project would expose sensitive receptors to substantial pollutant concentrations.

- Implementing Mitigation Measures AQ-2a, Construction Emissions Minimization Plan; AQ-2b, Construction Equipment Maintenance and Tuning; AQ-2c, Heavy-Duty Truck Model Year Requirement; AQ-2e, Best Available Emissions Controls for Stationary Emergency Generators; AQ-2f, Operational Diesel Truck Emission Reduction; AQ-2g, Electric Vehicle Charging; AQ-2h, Enhanced Transportation Demand Management Program; and AQ-3, Exposure to Air Pollution—Toxic Air Contaminants, would reduce the severity of the impact, but not to a less-than-significant level.

Impact C-AQ-1: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area, would result in a cumulatively considerable contribution to significant cumulative regional air quality impacts.

- Implementing Mitigation Measures AQ-2a, Construction Emissions Minimization Plan; AQ-2b, Construction Equipment Maintenance and Tuning; AQ-2c, Heavy-Duty Truck Model Year Requirement; AQ-2d, Super-Compliant VOC Architectural Coatings during Operations; AQ-2e, Best Available Emissions Controls for Stationary Emergency Generators; AQ-2f, Operational Diesel Truck Emission Reduction; AQ-2g, Electric Vehicle Charging; AQ-2h, Enhanced Transportation Demand Management Program; and AQ-5, Hydrogen Sulfide and Odor Management Program for the Potential Water Reuse Facility(s), would reduce the severity of the impact, but not to a less-than-significant level.

Impact C-AQ-2: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area, would result in a cumulatively considerable contribution to significant cumulative health risk impacts on sensitive receptors.

- Implementing Mitigation Measures AQ-2a, Construction Emissions Minimization Plan; AQ-2b, Construction Equipment Maintenance and Tuning; AQ-2c, Heavy-Duty Truck Model Year Requirement; AQ-2e, Best Available Emissions Controls for Stationary Emergency Generators; AQ-2f, Operational Diesel Truck Emission Reduction; AQ-2g, Electric Vehicle Charging; AQ-2h, Enhanced Transportation Demand Management Program; and AQ-3, Exposure to Air Pollution—Toxic Air Contaminants, would reduce the severity of the impact, but not to a less-than-significant level.

Cultural Resources

Impact CU-1: The proposed project would demolish historic architectural resources, resulting in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.

- Implementing Mitigation Measures CU-1a, Documentation; CU-1b, Relocation; CU-1c, Interpretation/Commemoration; and CU-1d, Salvage, would reduce the severity of the impact, but not to a less-than-significant level.

Impact CU-3: The proposed project would construct one or more additions to and adaptively reuse 150 South Montgomery Street (Hellwig Ironworks). The proposed additions and modifications would result in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.

- Implementing Mitigation Measure CU-1a, Documentation, and Mitigation Measure CU-1c, Interpretation/Commemoration, would reduce the severity of the impact, but not to a less-than-significant level.

Impact C-CU-1: The proposed project would make a cumulatively considerable contribution to previously identified significant citywide cumulative adverse impact on historical resources as defined in CEQA Guidelines Section 15064.5.

- Implementing Mitigation Measures CU-1a, Documentation; CU-1b, Relocation; CU-1c, Interpretation/Commemoration; and CU-1d, Salvage, would reduce the severity of the project's contribution, but not to a less-than-significant level.

Land Use

Impact LU-2: The proposed project would cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

- Implementing Mitigation Measure NO-3, Exposure to Airport Noise, would reduce the severity of the impact, but not to a less-than-significant level.

Impact C-LU-2: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would result in a significant cumulative impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

- Implementing Mitigation Measure NO-3, Exposure to Airport Noise, would reduce the project's contribution to this cumulative impact, which would remain significant and unavoidable.

Noise and Vibration

Impact NO-1b: Project-generated traffic noise would result in permanent increases in ambient noise levels in the vicinity of the project in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies.

- Implementing Mitigation Measure NO-1b, Traffic Noise Impact Reduction, would reduce roadside noise impacts at existing noise-sensitive receptors, but not to a less-than-significant level.

Impact NO-1c: Construction of the proposed project could result in temporary increases in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

- Implementing Mitigation Measure NO-1c, Master Construction Noise Reduction Plan, would implement a construction noise logistics plan to reduce the noise impact with respect to exposure of persons to, or generation of, noise levels in excess of standards

established in the local general plan, specific plan, or other land use plan, but not to a less-than-significant level.

Impact NO-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the proposed project could expose people residing or working in the project area to excessive noise levels.

- Implementing Mitigation Measure NO-3, Exposure to Airport Noise, would reduce interior noise levels; however, because the project could include outdoor residential areas located within the airport's 65 dB CNEL contour, it could result in a land use that is not compatible with the CLUP and the impact would remain significant and unavoidable.

Impact C-NO-1: Construction activities of the proposed project combined with cumulative construction noise in the project area would result in substantial temporary or periodic increase in ambient noise levels in excess of standards established in the Envision San José 2040 General Plan (General Plan) or Noise Ordinance.

- Implementing Mitigation Measure NO-1c, Master Construction Noise Reduction Plan, would reduce the project's contribution to this cumulative impact, which would remain significant and unavoidable.

Impact C-NO-2: Operation of the proposed project when considered with other cumulative development would cause a substantial permanent increase in ambient noise levels in excess of standards established in the General Plan or Noise Ordinance.

- Implementing Mitigation Measure C-NO-2, Cumulative Traffic Noise Impact Reduction, would reduce the project's contribution to this cumulative impact, but not to a less-than-significant level.

Impact C-NO-3: The proposed project would make a considerable contribution to exposure of people to excessive airport noise levels.

- Implementing Mitigation Measure NO-3, Exposure to Airport Noise, would reduce interior noise levels, reducing the project's contribution to this cumulative impact, which would remain significant and unavoidable due to outdoor residential areas within the airport's 65 dB CNEL contour.

Population and Housing

Impact C-PH-1: The proposed project would result in a cumulatively considerable contribution to the citywide significant and unavoidable cumulative impact related to the jobs/housing imbalance identified in the 2040 General Plan EIR.

- As described in the EIRs for the General Plan and Downtown Strategy 2040, there is no feasible mitigation for this impact.

5.3.2 Significant Impacts that Can Be Mitigated to Less than Significant

As stated above, a focus of the discussion of alternatives is to determine whether there are potentially feasible alternatives that could avoid or substantially lessen the significant impacts of the proposed project. This can include significant impacts for which mitigation measures have been identified to reduce the severity of project impacts to less than significant. As discussed throughout Chapter 3, *Setting, Impacts, and Mitigation*, and summarized in Table S-1, *Summary of Impacts and Mitigation*, in Chapter S, *Summary*, the proposed project would result in the following potentially significant impacts related to air quality, biological resources, cultural resources and tribal cultural resources, geology/soils/paleontological resources, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise and vibration, public services and recreation, transportation, and utilities/service systems that could be reduced to a less-than-significant level with mitigation:

Air Quality

Impact AQ-1: The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.

- Implementing Mitigation Measures AQ-2a, Construction Emissions Minimization Plan; AQ-2b, Construction Equipment Maintenance and Tuning; AQ-2c, Heavy-Duty Truck Model Year Requirement; AQ-2d, Super-Compliant VOC Architectural Coatings during Operations; AQ-2e, Best Available Emissions Controls for Stationary Emergency Generators; AQ-2f, Operational Diesel Truck Emission Reduction; AQ-2g, Electric Vehicle Charging; AQ-2h, Enhanced Transportation Demand Management Program; AQ-3, Exposure to Air Pollution—Toxic Air Contaminants; and AQ-5, Hydrogen Sulfide and Odor Management Program for the Potential Water Reuse Facility(s), would reduce air emissions and bring the project into conformance with the Clean Air Plan.

Impact AQ-5: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

- Implementing Mitigation Measure AQ-5, Hydrogen Sulfide and Odor Management Program for the Potential Water Reuse Facility(s), would reduce this impact to a less-than-significant level.

Biological Resources

Impact BI-1: The proposed project could have a substantial adverse effect, either directly, indirectly, or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS (western pond turtle, central California coast steelhead distinct population segment, nesting birds, special-status bats).

- Implementing Mitigation Measures BI-1a, General Avoidance and Protection Measures; BI-1b, In-Water Construction Schedule; BI-1c, Native Fish Capture and Relocation; BI-1d, Western Pond Turtle Protection Measures; BI-1e, Avoidance of Impacts on

Nesting Birds; and BI-1f, Roosting Bat Surveys, would reduce this impact to a less-than-significant level.

Impact BI-2: The proposed project could have a substantial adverse effect on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS.

- Implementing Mitigation Measures BI-1a, General Avoidance and Protection Measures; BI-1b, In-Water Construction Schedule; BI-1c, Native Fish Capture and Relocation; BI-1e, Avoidance of Impacts on Nesting Birds; BI-1f, Roosting Bat Surveys; BI-2a, Avoidance of Impacts on Riparian Habitat; BI-2b, Frac-Out Contingency Plan; BI-2c, Monitor Effects of Shading and Heat Island Effect on Riparian Vegetation and Stream Temperature; BI-2d, Avoidance and Protection of Creeping Wild Rye Habitat; HY-3b, Plan for Ongoing Creek Maintenance; and NO-1a, Operational Noise Performance Standard, would reduce this impact to a less-than-significant level.

Impact BI-3: The proposed project could have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

- Implementing Mitigation Measures BI-1a, General Avoidance and Protection Measures; BI-2a, Avoidance of Impacts on Riparian Habitat; BI-2d, Avoidance and Protection of Creeping Wild Rye Habitat; and BI-3, Avoidance of Impacts on Wetlands and Waters, would reduce this impact to a less-than-significant level.

Impact BI-4: The proposed project could interfere substantially with the movement of a native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

- Implementing Mitigation Measure BI-4, Avian Collision Avoidance Measures, would reduce this impact to a less-than-significant level.

Impact BI-6: The proposed project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

- Implementing Mitigation Measures BI-1a, General Avoidance and Protection Measures; BI-1b, In-Water Construction Schedule; BI-1c, Native Fish Capture and Relocation; and BI-2a, Avoidance of Impacts on Riparian Habitat, would reduce this impact to a less-than-significant level.

Impact C-BI-1: The proposed project, in conjunction with other past, current, or foreseeable development in the project vicinity, could result in cumulative impacts on biological resources.

- Implementing Mitigation Measures BI-1a, General Avoidance and Protection Measures; BI-1b, In-Water Construction Schedule; BI-1c, Native Fish Capture and Relocation; BI-1d, Western Pond Turtle Protection Measures; BI-1e, Avoidance of Impacts on Nesting Birds; BI-1f, Roosting Bat Surveys; BI-2a, Avoidance of Impacts on Riparian Habitat; BI-2b, Frac-out Contingency Plan; BI-2c, Monitor Effects of Shading and Heat Island Effect on Riparian Vegetation and Stream Temperature; BI-2d, Avoidance and Protection of Creeping Wild Rye Habitat; BI-3, Avoidance of Impacts on Wetlands and

Waters; BI-4, Avian Conflict Avoidance Measures; HY-3b, Plan for Ongoing Creek Maintenance; and NO-1a, Operational Noise Performance Standard, would reduce the project's contribution to cumulative impacts, resulting in a less-than-significant impact.

Cultural Resources and Tribal Cultural Resources

Impact CU-2: The proposed project would relocate, construct an addition to, and adaptively reuse the historic portions of 40 South Montgomery Street (Kearney Pattern Works and Foundry). This could result in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5

- Implementing Mitigation Measure CU-2a, Relocation On-site; and Mitigation Measure CU-2b, Compliance with the Secretary of the Interior's Standards, would reduce this impact to a less-than-significant level.

Impact CU-4: The proposed project could result in significant impacts on historic resources resulting from construction-related vibrations.

- Implementing Mitigation Measure CU-4, Construction Vibration Operation Plan for Historic Structures; and Mitigation Measure NO-2a, Master Construction Vibration Avoidance and Reduction Plan, would reduce this impact to a less-than-significant level.

Impact CU-7: The proposed project could result in significant impacts at 105 South Montgomery Street (Stephen's Meat Projects sign), a historic resource, as a result of its removal, storage, and relocation within the project site.

- Implementing Mitigation Measure CU-7, Sign Relocation, would reduce this impact to a less-than-significant level.

Impact CU-8: The proposed project could cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5.

- Implementing Mitigation Measures CU-8a, Cultural Resources Awareness Training; CU-8b, Archaeological Testing Plan; CU-8c, Archaeological Evaluation; and CU-8d, Archaeological Resources Treatment Plan, would reduce this impact to a less-than-significant level.

Impact CU-9: The proposed project would disturb human remains, including those interred outside of formal cemeteries.

- Implementing Mitigation Measure CU-8a, Cultural Resources Awareness Training, would reduce this impact to a less-than-significant level.

Impact CU-10: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074.

- Implementing Mitigation Measures CU-8a, Cultural Resources Awareness Training; CU-8b, Archaeological Testing Plan; CU-8c, Archaeological Evaluation; and CU-8d, Archaeological Resources Treatment Plan, would reduce this impact to a less-than-significant level.

Impact C-CU-4: The proposed project would combine with other projects to result in significant cumulative effects on archaeological resources as defined in CEQA Guidelines Section 15064.5; human remains, including those interred outside of formal cemeteries; and tribal cultural resources as defined in Public Resources Code Section 21074.

- Implementing Mitigation Measures CU-8a, Cultural Resources Awareness Training; CU-8b, Archaeological Testing Plan; CU-8c, Archaeological Evaluation; and CU-8d, Archaeological Resources Treatment Plan, would reduce this impact to a less-than-significant level.

Geology/Soils/Paleontological Resources

Impact GE-1: The proposed project could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking; or seismic-related ground failure, including liquefaction.

- Implementing Mitigation Measure GE-1, Seismic Damage and Seismic-Related Ground Failure, including Liquefaction, would reduce this impact to a less-than-significant level.

Impact GE-3: The proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

- Implementing Mitigation Measure GE-3, Geotechnical Report, would reduce this impact to a less-than-significant level.

Impact GE-5: The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

- Implementing Mitigation Measures GE-5a, Project Paleontologist; GE-5b, Worker Training; GE-5c, Paleontological Monitoring; and GE-5d, Significant Fossil Treatment, would reduce this impact to a less-than-significant level.

Impact C-GE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, could result in significant cumulative impacts related to geology, soils, or paleontology.

- Implementing Mitigation Measures GE-5a, Project Paleontologist; GE-5b, Worker Training; GE-5c, Paleontological Monitoring; and GE-5d, Significant Fossil Treatment, would reduce the project's contribution to cumulative impacts, resulting in a less-than-significant impact.

Greenhouse Gas Emissions

Impact GR-2: The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

- Implementing Mitigation Measures GR-2, Compliance with AB 900; AQ-2a, Construction Emissions Minimization Plan; AQ-2b, Construction Equipment Maintenance and Tuning; AQ-2c, Heavy-Duty Truck Model Year Requirement; AQ-2e, Best Available Emissions Controls for Stationary Emergency Generators; AQ-2f, Diesel Truck Emissions Reduction;

AQ-2g, Electric Vehicle Charging; and AQ-2h, Enhanced Transportation Demand Management Program, would reduce this impact to a less-than-significant level.

Hazards and Hazardous Materials

Impact HA-2: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

- Implementing Mitigation Measure HA-3b, Health and Safety Plan, and Mitigation Measure HA-3c, Site Management Plan, would reduce this impact to a less-than-significant level.

Impact HA-3: The proposed project is located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

- Implementing Mitigation Measures HA-3a, Land Use Limitations; HA-3b, Health and Safety Plan; HA-3c, Site Management Plan; and HA-3d, Vapor Mitigation, would reduce this impact to a less-than-significant level.

Impact HA-4: The proposed project is located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, but would not result in a safety hazard or excessive noise for people residing or working in the project area.

- Implementing Mitigation Measure NO-3, Exposure to Airport Noise, would reduce this impact to a less-than-significant level.

Impact C-HA-1: The proposed project would not combine with other projects to result in significant cumulative impacts related to hazardous materials.

- Implementing Mitigation Measures HA-3b, Health and Safety Plan; HA-3c, Site Management Plan; and HA-3d, Vapor Mitigation, would reduce the project's contribution to cumulative impacts, resulting in a less-than-significant impact.

Impact C-HA-2: The proposed project would not combine with other projects to result in significant cumulative impacts related to proximity to airports.

- Implementing Mitigation Measure NO-3, Exposure to Airport Noise, would reduce this impact to a less-than-significant level.

Hydrology and Water Quality

Impact HY-1: The proposed project could violate a water quality standard or waste discharge requirement or otherwise substantially degrade surface or groundwater quality.

- Implementing Mitigation Measures HY-1, Water Quality Best Management Practices during Construction Activities in and near Waterways; BI-1a, General Avoidance and Protection Measures; BI-2a, Avoidance of Impacts on Riparian Habitat; HA-3b, Health and Safety Plan; and HA-3c, Site Management Plan, would reduce the project's impact to a less-than-significant level.

Impact HY-3: The proposed project could substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

- Implementing Mitigation Measures HY-1, Water Quality Best Management Practices during Construction Activities in and near Waterways; HY-3a, Flood Risk Analysis and Modeling; HY-3b, Plan for Ongoing Creek Maintenance; and BI-1a, General Avoidance and Protection Measures, would reduce this impact to a less-than-significant level.

Impact HY-4: The proposed project could create or contribute runoff water that could exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows.

- Implementing Mitigation Measures HY-1, Water Quality Best Management Practices during Construction Activities in and near Waterways; HY-3a, Flood Risk Analysis and Modeling; and HY-3b, Plan for Ongoing Creek Maintenance, would reduce this impact to a less-than-significant level.

Impact HY-5: The proposed project could risk release of pollutants in a flood hazard, tsunami, or seiche zone due to project inundation.

- Implementing Mitigation Measure HY-3a, Flood Risk Analysis and Modeling, and Mitigation Measure HY-3b, Plan for Ongoing Creek Maintenance, would reduce this impact to a less-than-significant level.

Impact HY-6: The proposed project could conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

- Implementing Mitigation Measure HA-3b, Health and Safety Plan, and Mitigation Measure HA-3c, Site Management Plan, would reduce this impact to a less-than-significant level.

Impact C-HY-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, could result in a considerable contribution to cumulative impacts on hydrology and water quality.

- Implementing Mitigation Measures HY-1, Water Quality Best Management Practices during Construction Activities in and near Water; BI-1a, General Avoidance and Protection Measures; BI-2a, Avoidance of Impacts on Riparian Habitat; HA-3b, Health and Safety Plan; and HA-3c, Site Management Plan, would reduce the project's contribution to cumulative impacts, resulting in a less-than-significant impact.

Impact C-HY-3: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, could result in a considerable contribution to cumulative impacts related to flood hazards.

- Implementing Mitigation Measure HY-3a, Flood Risk Analysis and Modeling, and Mitigation Measure HY-3b, Plan for Ongoing Creek Maintenance, would reduce the project's contribution to cumulative impacts, resulting in a less-than-significant impact.

Noise and Vibration

Impact NO-1a: Stationary sources associated with operation of the proposed project could result in generation of a permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

- Implementing Mitigation Measure NO-1a, Operational Noise Performance Standard, would reduce this impact to a less-than-significant level.

Impact NO-2: The proposed project could result in the generation of excessive groundborne vibration or groundborne noise levels.

- Implementing Mitigation Measures NO-2a, Master Construction Vibration Avoidance and Reduction Plan; NO-2b, Master Construction Vibration Avoidance from Compaction; and CU-4, Construction Vibration Operation Plan for Historic Structures, would reduce this impact to a less-than-significant level.

Public Services and Recreation

Impact PS-7: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

- Implementing Mitigation Measures AQ-2a, AQ-2b, AQ-2c, BI 1a, BI 1b, BI 1c, BI 1d, BI 1e, BI 1f, BI 2a, BI 2b, BI 2d, BI 3, CU 8a, CU 8b, CU 8c, CU 8d, GE 5a, GE 5b, GE 5c, GE 5d, GR-2, HA 3a, HA 3b, HA 3c, HY-1, HY-3a, NO-1c, NO-2a, and NO-2b would reduce this impact to a less-than-significant level.

Transportation

Impact TR-7: The proposed project would cause a decrease in average travel speed on a transit corridor below Year 2040 Cumulative No Project conditions in the 1-hour a.m. peak period when the average speed drops below 15 mph or decreases by 25 percent or more; OR when the average speed drops by 1 mph or more for a transit corridor with average speed below 15 mph.

- Implementing Mitigation Measure AQ-2h, Enhanced Transportation Demand Management Program, would reduce this impact to a less-than-significant level.

Impact C-TR-1: The proposed project would result in a cumulatively considerable contribution to a significant transportation impact.

- Implementing Mitigation Measure AQ-2h, Enhanced Transportation Demand Management Program, would reduce the project's contribution to cumulative impacts, resulting in a less-than-significant impact.

Utilities and Service Systems

Impact UT-1: The proposed project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.

- Implementing Mitigation Measures AQ-2a, AQ-2b, AQ-2c, BI-1a, BI-1b, BI-1c, BI-1d, BI-1e, BI-1f, BI-2a, BI-2b, BI-2d, BI-3, CU-8a, CU-8b, CU-8c, CU-8d, GE-5a, GE-5b, GE-5c, GE-5d, HA-3a, HA-3b, HA-3c, HA-3d, HY-1, HY-3a, NO-1c, NO-2a, and NO-2b would reduce this impact to a less-than-significant level.

Impact UT-3: The proposed project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects.

- Implementing Mitigation Measures AQ-2a, AQ-2b, AQ-2c, BI-1a, BI-1b, BI-1c, BI-1d, BI-1e, BI-1f, BI-2a, BI-2b, BI-2d, BI-3, CU-8a, CU-8b, CU-8c, CU-8d, GE-5a, GE-5b, GE-5c, GE-5d, HA-3a, HA-3b, HA-3c, HA-3d, HY-1, HY-3a, NO-1c, NO-2a, and NO-2b would reduce this impact to a less-than-significant level.

Impact UT-5: The proposed project would not require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects.

- Implementing Mitigation Measures AQ-2a, AQ-2b, AQ-2c, BI-1a, BI-1b, BI-1c, BI-1d, BI-1e, BI-1f, BI-2a, BI-2b, BI-2d, BI-3, CU-8a, CU-8b, CU-8c, CU-8d, GE-5a, GE-5b, GE-5c, GE-5d, HA-3a, HA-3b, HA-3c, HA-3d, HY-1, HY-3a, NO-1c, NO-2a, and NO-2b would reduce this impact to a less-than-significant level.

Impact UT-6: The proposed project would not require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

- Implementing Mitigation Measures AQ-2a, AQ-2b, AQ-2c, BI-1a, BI-1b, BI-1c, BI-1d, BI-1e, BI-1f, BI-2a, BI-2b, BI-2d, BI-3, CU-8a, CU-8b, CU-8c, CU-8d, GE-5a, GE-5b, GE-5c, GE-5d, HA-3a, HA-3b, HA-3c, HA-3d, HY-1, HY-3a, NO-1c, NO-2a, and NO-2b would reduce this impact to a less-than-significant level.

5.4 Alternatives Evaluated but Rejected

As required pursuant to CEQA Guidelines Section 15126.6(c), consideration was given to alternatives that could avoid or substantially lessen potentially significant impacts resulting from the proposed project, including comments received in response to the NOP that suggested alternatives for consideration in the EIR, as addressed below. The following alternatives were considered but were not analyzed in detail because they would not fulfill most of the basic objectives of the project, would not avoid or substantially lessen significant environmental impacts, and/or would be infeasible.

5.4.1 Off-Site Location Alternative

This alternative would locate the project's development program to another transit-accessible site in the City of San José or the region. The location would need to be approximately 81 acres in size with comparable height allowances to accommodate all proposed project uses, as described in Chapter 2, *Project Description*, and would need to be transit-accessible to avoid resulting in greater impacts than those of the project.

CEQA Guidelines Section 15126.6(f)(2) requires the consideration of alternate sites, including an examination of their potential feasibility and whether they would avoid or substantially reduce the significant impacts of the project. In this case, the City considered both whether there are other transit-accessible sites in the City or the region that would provide a similar amount of land for redevelopment, *and* whether such sites would be feasible based on the factors identified in CEQA Guidelines Section 15126.6(f)(1).

There are no sites in San Jose of similar size that are vacant or could be readily assembled and that have comparable amounts of planned transit. There may be a limited number of other sites in the region that meet the acreage requirements, are similarly transit-accessible and where the site is either vacant or can be readily assembled. However, the project applicant does not own these sites or have site control, which is one of the factors contributing to a site's feasibility. The project applicant does own land elsewhere in the City and the region (for example, in the Alviso District of north San José, and at the Google campuses in Mountain View and Sunnyvale). These sites are already developed, are already under separate study for development, and would not be able to additionally accommodate the program contemplated in this project. Also, it would not be feasible to evaluate an alternative location (i.e., in another city or location in San José) that could accomplish the objective of creating a vibrant Downtown San Jose neighborhood. An alternate site would also not address the City's objective to advance the goals and strategies of the Downtown Strategy 2040 and the Diridon Station Area Plan (DSAP). For these reasons, no off-site alternative was carried forward for in-depth analysis in this EIR.

5.4.2 Additional Residential Development Alternative

Under this alternative, the project would be modified to include approximately 17,750 dwelling units rather than 3,000 to 5,900 units, as under the proposed project. The amount of office space and other proposed uses would be the same as under the proposed project. The substantial amount of new housing in this alternative is based on a study completed by Beacon Economics for Working Partnerships USA.[1] The study examined the potential impact of on-site employment on the rental housing market, and suggested a housing response assuming that all new employees would require new housing (i.e., that new jobs would be filled by new residents who would relocate to the City or the region).

Additional housing would reduce or eliminate the project's contribution to the citywide significant cumulative impact related to a projected imbalance between jobs and housing by the year 2040. However, this alternative was not selected for in-depth analysis for a number of reasons. First, it

[1] Refer to Section 3.11, *Population and Housing*, for discussion of this report.

would not be consistent with the City's goals, as expressed in the General Plan, the DSAP and Downtown Strategy 2040, of significantly increasing the ratio of jobs to housing in the Downtown area. Second, because the alternative would provide all other uses included in the proposed project in the same amounts (e.g., 7.3 million gross square feet [gsf] of office uses), it would be difficult or impossible to accommodate the additional housing without increasing height limits beyond those proposed with the project (and allowed near the airport). In addition, the density required to accommodate such housing would be anticipated to exceed the allowance of 800 dwelling units per acre under the General Plan's Downtown designation. Also, with its increased intensity, this alternative would increase rather than reduce other significant impacts of the project, such as the air quality and noise impacts discussed in Chapter 3 and listed in Section 5.2, *Significant Impacts of the Proposed Project.* Alternative 3, Reduced Office Alternative, addresses the project's contribution to the citywide significant cumulative impact related to a projected imbalance between jobs and housing by the year 2040 without raising the additional issues regarding height, density, and associated increases in other significant environmental impacts.

5.4.3 Creek Setback Alternative

Under this alternative, the project would include 100-foot setbacks along Los Gatos Creek, consistent with the general setback provisions of the City's riparian corridor policy,[2] reducing the significant (and mitigable) biological impacts of the proposed project. The setbacks would occur at the following locations:

- At the properties along Autumn Street, affecting the amount of publicly accessible open space;
- At five locations (Blocks D8 through D12) on Autumn Street between West Santa Clara Street and the VTA light-rail tracks, where proposed retail, cultural arts, education, or other active uses could occur within the footprint of existing buildings;
- At the publicly accessible open space and one location (Block D13) between the VTA light-rail tracks and West San Fernando Street; and
- At the block (H2) on the northwest corner of West San Carlos Street and Bird Avenue, reducing the amount of housing that could be constructed.

This alternative was not included for further analysis because it would require more material modifications to the project than other reduced density alternatives and potential biological impacts of the proposed project can be reduced to less than significant through feasible mitigation.

Refer to Figure 2-3 in Chapter 2, *Project Description*, for the setback locations. The setbacks would also affect blocks along Delmas Avenue, affecting the amount of publicly accessible open space (adjacent to Block E1 and E2) between West Santa Clara Street and the VTA light-rail tracks.

The expanded setbacks would reduce the size of the five buildings that could be constructed on Autumn Street between West Santa Clara Street and the VTA tracks, and would have the potential to eliminate three of these buildings (on Blocks D9, D11, and D12). This setback would

[2] City of San José, *Riparian Corridor Protection and Bird-Safe Design* (Policy 6-34), approved August 23, 2016. Available at https://www.sanjoseca.gov/home/showdocument?id=12815.

also have the potential to eliminate the building proposed on Autumn Street between the VTA tracks and West San Fernando Street (on Block D13), as well as the proposed Los Gatos Creek Trail. The increased setbacks would not, however, affect the proposed replacement bridge over Los Gatos Creek at West San Fernando Street (replacement of an existing bridge) or the proposed new footbridge (pedestrian trails are exempt from the riparian corridor policy). Also exempt are public infrastructure projects to reduce flooding.

The size reduction for these buildings and open space, or the loss of these buildings and open space, would reduce the amount of retail, cultural, arts, education, or other active uses in the project. It also would reduce the ability to meet project objectives such as activating commercial spaces and could reduce the space potentially available elsewhere on the project site for other types of open spaces because the increased setbacks would reduce the site's overall developable area. In addition, this alternative would not avoid or substantially lessen any of the significant and unavoidable impacts of the project. Under this alternative, overall development would be reduced. This EIR analyzes two alternatives that provide a comparison between the proposed project and alternatives with reduced development. Finally, the City's riparian corridor policy expressly allows deviation from the generally applicable 100-foot setback where, as here, all impacts to riparian resources are mitigated to less-than-significant. For these reasons, the Creek Setback Alternative was not carried forward for in-depth analysis in this EIR.

5.4.4 Substantially Reduced Project (Avoidance of Significant Criteria Air Pollution Impacts)

This alternative would reduce the project to avoid or reduce to a less than significant level the significant and unavoidable impact of project operations related to emissions of criteria air pollutants. Specifically, the project would need to be reduced by nearly 90 percent to include approximately 700 dwelling units, about 880,000 gsf of office space, and about 60,000 gsf of active uses (e.g., commercial retail/restaurant, cultural, institutional, child care, and education). Hotel rooms and limited-term corporate accommodations would be reduced by comparable amounts, to about 35 and 100 rooms, respectively.[3]

It should be noted that the project, in keeping with City policies, is designed to reduce per-person (resident, employee and visitor) air pollutant emissions by providing dense, walkable development adjacent to high-quality transit. Project operations would exceed mass emissions significance thresholds for criteria air pollutants only because the project is large. If an alternative reducing the project by almost 90 percent were adopted, emissions from the project site could remain below the mass thresholds, but the remaining 90 percent of development would be expected to occur elsewhere, most likely on a site or sites with less favorable transit opportunities. Accordingly, overall criteria air pollutant emissions in the region would reasonably be expected to rise.

In addition, development at this limited scale, as compared to the project, would represent a fundamentally different project than is proposed; therefore, this alternative has been deemed infeasible. Moreover, this alternative would not meet the project applicants' and the City's objectives

[3] The required reduction in project size is based on a straight-line reduction in maximum operational emissions of reactive organic gases, the criteria pollutant that would be emitted in the greatest volume by project operations.

of developing new office space to support the long-term expansion of the project applicant's Bay Area operations and workforce, encouraging ambitious job creation and promote development of Downtown as a regional job center, supporting the implementation of the adopted 2014 DSAP, and of delivering thousands of units of new, high-quality housing. Because it would not meet most of the project objectives, this alternative is infeasible and is not considered further in this EIR.

5.4.5 No Project (No Development) Alternative

This alternative would assume no new development on the project site. Existing buildings on the project site could be reused, but further development would not occur.

This alternative would require the City to stop implementing its General Plan beyond current approved "pipeline" projects, which is neither a reasonable assumption nor consistent with the City's adopted laws and policies. CEQA Guidelines Section 15126.6(e) provides that "where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment." Here, because the City has adopted policies that plan for substantial growth in the Diridon Station Area and there has been considerable development activity in the vicinity, assuming a "no build" scenario would require "analyzing a set of artificial assumptions," so is not required. This alternative would also not accomplish any of the project applicant's or the City's project objectives and thus has not been carried forward for in-depth analysis. This alternative would essentially reflect the existing setting conditions, which are described throughout Chapter 3 of the EIR. Also, another No Project Alternative, which reflects continued growth and development under the current DSAP and General Plan, has been included below.

5.5 Selection and Analysis of Project Alternatives

In selecting alternatives for analysis in this chapter, the City of San José considered: the project objectives and significant impacts identified above; the potential feasibility of alternatives based on factors in CEQA Guidelines Section 15126.6(f)(1); and whether the alternative would substantially reduce or eliminate environmental impacts of the projects, with a particular emphasis on significant and unavoidable impacts.

Consistent with these requirements, and CEQA's requirement for a No Project Alternative, this chapter describes the following alternatives:

- Alternative 1: No Project Alternative/DSAP Development Alternative
- Alternative 2A: Historic Preservation Alternative
- Alternative 2B: Historic Preservation/San José International Airport Comprehensive Land Use Plan (CLUP) Noise Compliance Alternative
- Alternative 3: 150 South Montgomery Street Preservation Alternative
- Alternative 4: Reduced Office Alternative
- Alternative 5: Reduced Intensity Alternative

Table 5-1 compares the development program of the project and the alternatives, each of which is described further below.

The following discussion provides a comparative evaluation of the environmental consequences of the alternatives selected for further consideration in this EIR. Consistent with the requirements of CEQA Guidelines Section 15126.6(d), the discussion includes "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with" the proposed project. As provided for under CEQA, where an alternative would cause a significant impact that would not otherwise be caused by the proposed project, the significant impact of the alternative is discussed, but in less detail than the significant impacts of the proposed project that are presented in Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*. In some cases, there may be a topic area (e.g., Transportation) where certain impacts are the same as or similar to the proposed project, while others are less severe or more severe than the proposed project. In these cases, the alternative analysis splits up the topic area and presents information to assist the reader in understanding how the individual impacts within the topic area compare to the proposed project, and the reader will see, for example, some Transportation impacts discussed in the "same as or similar to" category, and some in the "less severe" category.

In order to assist comparison of the impacts of the Proposed Project and the Alternatives, **Table 5-8**, *Comparison of the Impacts of the Project and Alternatives*, at the end of this chapter, indicates for each significant impact, whether the impacts of the project alternatives are equal to, less, or more severe than those of the proposed project.

5.5.1 Alternative 1: No Project/DSAP Development Alternative

Under the No Project/DSAP Development Alternative, the project applicant's Downtown West Mixed-Use Plan would not move forward, and development on the site would continue to occur over time, based on market demand and consistent with current plans and policies. There would be no unified development plan for the site other than development projected under the existing adopted DSAP. Lots A, B, and C would remain as surface parking. Blocks E1, E2, and E3 (the former San Jose Water Company site) would remain outside the DSAP boundary, where the previously approved development project would proceed as approved, resulting in construction of approximately 1.0 million gsf of office space, 31,000 square feet of retail, and 325 residential units on this site (included in the total program for this alternative). There would be no changes to the DSAP as part of this alternative (although, as noted in Chapter 2, *Project Description*, the City is separately proceeding with amendments to the DSAP), to the General Plan, or to existing zoning, although this alternative assumes that the ballpark site included in the DSAP when it was adopted in June 2014 would be developed with a mix of uses consistent with the adjacent General Plan land use designation, Commercial Downtown.[4]

[4] The ballpark site identified in the 2014 DSAP is now privately owned, no proposal exists to develop a ballpark, and it is not realistic to assume that it would retain its Public/Quasi Public land use designation in the future. The ballpark envisioned at the time of the 2014 DSAP was intended as a new venue for the Oakland A's. After a series of political and legal actions reaching the U.S. Supreme Court and a change in team ownership, the A's refocused their efforts on building a new ballpark in Oakland. There is no active consideration of a major league ballpark in San José at this time.

TABLE 5-1
LAND USE PROGRAM ASSOCIATED WITH THE PROJECT AND ALTERNATIVES

	Proposed Project	Alternative 1: No Project/DSAP Development Alternative[a]	Alternative 2A: Historic Preservation Alternative	Alternative 2B: Hist. Pres./CLUP Noise Compliance Alternative	Alternative 3: 150 S. Montgomery Street Preservation Alternative	Alternative 4: Reduced Office Alternative	Alternative 5: Reduced Intensity Alternative
Residential	5,900 dwelling units	625 dwelling units	5,665 dwelling units	3,600 dwelling units	5,900 dwelling units	5,900 dwelling units	2,655 dwelling units
Active Uses[b]	500,000 gsf	380,000 gsf	432,000 gsf	436,000 gsf	500,000 gsf	225,000 gsf	150,000 gsf
Hotel	300 rooms	419 rooms	300 rooms	300 rooms	300 rooms	300 rooms	135 rooms
Limited-Term Corporate Accommodation	800 rooms	0 rooms	340 rooms	800 rooms	800 rooms	320 rooms	320 rooms
Office	7.3 million gsf	4.9 million gsf	5.69 million gsf	7.3 million gsf	7.3 million gsf	3.0 million gsf	3 million gsf
Event/Conference Ctr.	100,000 gsf	none	50,000 gsf	100,000 gsf	100,000 gsf	45,000 gsf	45,000 gsf
Infrastructure	230,000 gsf	none	137,000 gsf	230,000 gsf	230,000 gsf	200,000 gsf	127,000 gsf
Open Space[c]	approx. 15 acres	approx. 10 acres	approx. 15 acres	approx. 15 acres	approx. 15 acres	approx. 15 acres	approx. 8 acres

NOTES:

DSAP = Diridon Station Area Plan; gsf = gross square feet

[a] Based on development analyzed in the DSAP Draft Program Environmental Impact Report (December 2013), adjusted to conform with the site boundaries and to assume development of the ballpark site with uses permitted under the adjacent Envision San José 2040 General Plan land use designation of Commercial Downtown, and the previously approved project at 374 West Santa Clara Street (former San Jose Water Company Site).

[b] Active uses consist of Retail, Restaurant, Arts, Cultural, Live Entertainment, Institutional, Childcare and Education, Maker Spaces, Non-profit, and Small-Format Office.

[c] Open space includes all parks, plazas, green spaces, mid-block passages, and riparian buffers.

SOURCES: Data provided by Google LLC in 2019 and compiled by Environmental Science Associates in 2020.

With this adjustment to growth anticipated under the DSAP and analyzed in the DSAP EIR, plus the addition of the former San Jose Water Company site (Blocks E1, E2, and E3), the effective development area of the project site would be approximately 70 acres (Lots A, B, and C total about 11 acres), and this alternative would build out with a maximum of approximately 625 residential units, up to 380,000 square feet of retail/restaurant uses, up to 4.9 million gsf of office, and 9 acres of open space, as shown in Table 5-1. For comparison, the DSAP EIR assumed a districtwide maximum development of 2,588 dwelling units, 424,100 square feet of retail/restaurant uses, and 4.9 million square feet of office/research and development/light industrial uses in the 250-acre planning area. The overall intensity of development within the project site, measured by building floor area, would be reduced by approximately 56 percent compared to the proposed project. Given the substantial reduction in the development program compared to the proposed project, this alternative would likely preserve one or more historical resources that would be adversely affected under the proposed project.

Under the No Project/DSAP Development Alternative, development would be at lower densities than proposed with the project, and would not exceed the current height limits of 65–130 feet. The public open space network envisioned in the DSAP would build out incrementally, as would the street improvements and bicycle network identified in the plan. As explained in Chapter 2, *Project Description*, the City Council in 2019 directed Planning Division staff to develop greater height limits for portions of Downtown, including the Diridon Station Area. Therefore, it is possible that, under this alternative, one or more blocks on the project site could be developed at greater heights, and potentially at greater densities, than currently are permitted on the project site. However, in the absence of a coordinated development plan for this alternative, the analysis assumes existing height limits would remain because it would be speculative to identify potential future height increases that might be sought by individual developers. Because the underlying premise of this alternative is the adopted DSAP development program, the analysis likewise assumes the program set forth in the DSAP, with the exception that mixed-use development is assumed for the former ballpark site.

Comparison of Environmental Impacts

Air Quality

With less than half the total square footage of the proposed project, the No Project/DSAP Development Alternative would result in substantially fewer emissions of criteria pollutants and toxic air contaminants (TACs) and lower health risks from TAC emissions because it would include substantially less construction and total development at build-out. Although this alternative has not been quantified at the same level of detail as the proposed project, its reduced size would reduce operational emissions of reactive organic gases (ROG), oxides of nitrogen (NO_X), particulate matter 10 microns or less in diameter (PM_{10}), and $PM_{2.5}$ compared to those of the project; however, while emissions of $PM_{2.5}$ would be reduced to a less-than-significant level, the impact of ROG, NO_X, and PM_{10} emissions would remain significant and unavoidable. **Table 5-2** compares criteria pollutant emissions associated with operation of the alternatives to those of project operation.

TABLE 5-2
UNMITIGATED OPERATIONAL EMISSIONS OF CRITERIA POLLUTANTS—
COMPARISON OF ALTERNATIVE 1 TO THE PROPOSED PROJECT

	ROG	NO_X	PM_{10}	$PM_{2.5}$
Total Annual Emissions (tons per year)				
Significance Threshold	10	10	15	10
Proposed Project	**83**	**49**	**52**	**12**
Alternative 1: No Project/DSAP Development Alternative	**34**	**20**	**22**	5
Average Daily Emissions (pounds per day)				
Significance Threshold	54	54	82	54
Proposed Project	**471**	**306**	**327**	**77**
Alternative 1: No Project/DSAP Development Alternative	**195**	**120**	**145**	32

NOTES:
DSAP = Diridon Station Area Plan; NO_X = oxides of nitrogen; ROG = reactive organic gases; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; PM_{10} = particulate matter 10 microns or less in diameter

Mitigation measures included in the proposed project with mitigation include the following: MM AQ-2d: Super-Compliant VOC Architectural Coatings during Operations; MM AQ-2e: Best Available Emission Controls for Stationary Emergency Generators; MM AQ-2f: Operational Diesel Truck Emissions Reduction; MM AQ-2g: Electric Vehicle Charging; MM AQ-2h: Enhanced Transportation Demand Management Program.

SOURCE: Data compiled by Environmental Science Associates in 2020.

ROG, NO_X, and PM_{10} emissions from construction on the project site would also be less than those associated with the proposed project. However, NOx emissions from construction could continue to exceed significance thresholds under this alternative and could potentially constitute a significant and unavoidable impact with mitigation, depending on construction phasing. Pollutant concentrations of TACs and $PM_{2.5}$ at sensitive receptors during construction and operation of development under the No Project/DSAP Development Alternative would also be less than those with the proposed project due to the lesser amount of development. It is conservatively assumed that increased cancer risk and non-cancer chronic health effects would remain significant and unavoidable, even with mitigation, under this alternative, although the severity of this impact would be reduced compared to that of the project. This is because no health risk assessment has been prepared for this alternative, and therefore it is not possible to state with certainty that the reduction in emissions of cancer-causing toxic air contaminants, compared to emissions with the project, would be sufficient to reduce this impact to a less-than significant level. Health risk does not correlate to pollutant emissions in a linear fashion; instead, health risks depend on factors such as location and timing of emissions, particularly peak construction emissions. It is also anticipated that the impact related to localized annual average $PM_{2.5}$ concentrations for on-site receptors would remain significant and unavoidable with mitigation, like the proposed project, although this alternative's impact would be reduced in severity due to lesser vehicular emissions during project operations.

Biological Resources

Development under the No Project/DSAP Development Alternative would involve construction on the project site, although at lower densities than under the proposed project, and without the

coordinated development of site improvements and on-site utility systems. With less activity on the site, potential impacts on biological resources would be reduced. In addition, under this alternative, the West San Fernando Street bridge would not be replaced, the project's proposed new footbridge would not be built, and there would be no in-creek enhancement work within Los Gatos Creek. However, development would still occur, and would include a riparian setback at the previously approved project at 374 West Santa Clara that is smaller compared to the proposed project's. Special-status bird, bat, and aquatic species could be affected as part of the overall development of this alternative, as could riparian habitat and wetlands along Los Gatos Creek, the creeping wild rye sensitive natural community, and fish habitat in the creek. Similar to the proposed project, mitigation measures would reduce these impacts to a less-than-significant level.

Cultural Resources and Tribal Cultural Resources

Like the proposed project, the No Project/DSAP Development Alternative would involve development on a site that contains historic architectural resources. The DSAP EIR found that potential impacts on historic resources would be less than significant with application of General Plan policies and supplemental review of individual projects. The DSAP EIR found that cumulative effects on historic resources, however, would be significant and unavoidable due to planned demolition of the then-extant former KNTV Television Broadcast Facility at 645 Park Avenue, which was a component of the then-proposed major league baseball park within the DSAP area.[5] The DSAP EIR also identified a cumulative significant unavoidable effect from the ballpark on the setting and feeling of the Southern Pacific Depot historic district. However, the ballpark is no longer proposed, meaning that this specific cumulative effect may not occur, given that the previously proposed ballpark would have involved a more dramatic change in the setting and feeling around the depot than would most other development. The DSAP EIR found a potential cumulative significant unavoidable effect on the Southern Pacific Depot historic district from BART and high-speed rail development, to which the DSAP would contribute potential removal of contributing district elements and indirectly through new construction and circulation improvements that would affect the district setting and character.

This EIR has identified a number of historic resources not previously identified, including in the DSAP EIR (refer to Section 3.3, Cultural Resources and Tribal Cultural Resources). General Plan policies call for retention of historic resources, particularly designated and candidate City landmarks, the potential for several of which has been identified in this EIR. This alternative could potentially result in lesser impacts on historical resources, given that it would develop substantially lesser overall building square footage than would the proposed project and thus could potentially avoid demolition or substantial alteration of historical resources on the project site. However, with redevelopment activities occurring on the site, the No Project/DSAP Development Alternative could still result in demolition or substantial alteration of one or more historical resources such that the significance of the resource(s) would be materially impaired. While less severe than with the proposed project, these actions would result in a significant and unavoidable impact and a considerable contribution to cumulative impacts. Mitigation measures recommended for the project could reduce the severity of these impacts, but not to a less-than-

[5] The KNTV building was destroyed by fire in 2014.

significant level. Similar to the proposed project, effects of this alternative on archaeological resources and tribal cultural resources would be less than significant with mitigation.

Energy

With substantially less development than the proposed project, the No Project/DSAP Development Alternative would use less energy for construction and operations, although it would not benefit from the project's energy efficiency that would be achieved through district utility systems. Effects would be less than significant, as with the project.

Geology, Soils, Mineral Resources, and Paleontological Resources; Hazardous Materials

Because development would occur in the same area and on many, if not all, of the same sites as under the project, the No Project/DSAP Development Alternative would have similar effects as the proposed project. Impacts would be less than significant with the same mitigation measures as required under the proposed project.

Greenhouse Gas Emissions

The No Project/DSAP Development Alternative would result in lower total construction-related and operational greenhouse gas (GHG) emissions than the proposed project because less overall construction and less development would occur on the site. With these reduced emissions, it is likely that this alternative would still meet the City's efficiency metric thresholds for 2030 and 2040, similar to the proposed project, given the transit-accessible location of the site. However, it should be noted that a robust Transportation Demand Management program, similar to the project's, would likely be needed for this alternative to comply with the efficiency metrics, and such a program could reasonably be expected to be most successful in the context of a larger unified development concept, such as the proposed project. It is also assumed that the No Project/DSAP Development Alternative would not meet the "no net additional" GHG requirement of the Jobs and Economic Improvement Through Environmental Leadership Act of 2011 (AB 900) with implementation of the mitigation measure proposed for the project, including acquisition of carbon credits to offset project GHG emissions. Moreover, it would be unlikely that AB 900 or a comparable program would be invoked absent a unified development proposal for the site. As a result, the No Project/DSAP Development Alternative would likely not meet the "no net additional" requirement, would not acquire carbon credits, and would result in an overall increase in GHG emissions when compared to the proposed project.

Hydrology and Water Quality

Although the No Project/DSAP Development Alternative would result in substantially less development than the proposed project, development would occur in the same area and on many, if not all, of the same sites as under the project. Therefore, most effects related to hydrology and water quality, including flooding impacts and effects on Los Gatos Creek and the Guadalupe River, would be similar to those of the proposed project. However, this alternative would not include the project's preferred option of replacing the West San Fernando Street bridge over Los Gatos Creek and undertaking in-stream restoration and ongoing creek maintenance to increase

flood capacity in Los Gatos Creek. This could result in increased flooding impacts, compared to conditions with the proposed project, and could require more buildings developed pursuant to this alternative to have to undergo flood-proofing. However, impacts would be less than significant with the same mitigation measures as required under the proposed project.

Land Use

The mix of land uses under the No Project/DSAP Development Alternative would be more weighted toward commercial land uses, and have significantly less housing, both proportionally in relation to commercial uses, and in absolute numbers compared to the proposed project. Due to existing DSAP height limits and the DSAP street network, the land uses would be developed at lower densities, and likely in smaller buildings. The alternative would consist of infill development, intensifying the use of an underused site similar to the proposed project, and thus would not physically divide an established community. Development under the No Project/DSAP Development Alternative would be consistent with the General Plan, and therefore would not conflict with land use plans and policies. With less overall development and smaller buildings, shading on Downtown parks by the buildings proposed under this alternative would be less than shading under the proposed project, and as with the proposed project, the impact would be less than significant. Like the project, this alternative would have a significant unavoidable impact with respect to non-compliance with the San José International Airport Comprehensive Land Use Plan (CLUP) airport noise exposure policy because it would include residential units that could have outdoor recreational space within the 65 dBA CNEL airport noise contour.

Noise and Vibration

The No Project/DSAP Development Alternative would result in less overall development than the proposed project. Therefore, this alternative would result in less construction noise, less noise from stationary sources like backup generators, and less noise from traffic along area roadways than would result from the proposed project. The No Project/DSAP Development Alternative would reduce traffic noise, compared to that of the proposed project, but impacts along the three street segments where significant impacts would occur under the project would be expected to remain significant and unavoidable, assuming a uniform proportional reduction in traffic noise on all local streets. Additionally, even with less construction than under the proposed project, construction noise would contribute to cumulative significant and unavoidable construction noise impacts associated with Bay Area Rapid Transit (BART) construction near the project site, because even with substantially less development, this alternative would still constitute large-scale redevelopment of the project site that would likely involve many years of ongoing construction. Like the project, this alternative would have a significant unavoidable impact with respect to non-compliance with the CLUP airport noise exposure policy, as explained above under Land Use. Other noise and vibration impacts would be less than significant with mitigation, as under the proposed project.

Population and Housing

Like the proposed project, the No Project/DSAP Development Alternative would not displace substantial numbers of people, because the site currently has very few residents. The No Project/DSAP Development Alternative would not, however, add substantial additional housing

to the site, and would result in a smaller increase in population and employment than the project. This increase would not conflict with adopted plans or policies, similar to the proposed project, although it could contribute to the significant and unavoidable jobs/housing imbalance projected by 2040 under the General Plan, consistent with the findings of the DSAP EIR.[6] In particular, when compared to the proposed project, because this alternative has only a minimal amount of residential use compared to a significant amount of office use, it would have a greater contribution to this cumulative impact.

Public Services, Recreation, and Utilities

Implementing the No Project/DSAP Development Alternative would result in fewer residents and employees on site than with the proposed project, and thus a lower demand for public services, recreation facilities, and utilities. This alternative would provide less open space than the proposed project, although coupled with the reduced intensity, it would continue to have a less than significant impact on recreational facilities. Like the proposed project, this alternative would not result in significant impacts related to the need for new facilities or infrastructure; mitigation applicable to the proposed project would also apply.

Transportation

With substantially less overall development than the proposed project, the No Project/DSAP Development Alternative would generate about half the vehicle traffic of the project. The alternative would not include the street network changes and pedestrian/bicycle improvements proposed by the project, but proposals included in the DSAP could be funded and implemented over time. With the proximity of the site to Diridon Station and excellent access to transit, the No Project/DSAP Development Alternative, like the proposed project, would not result in a significant impact related to vehicle miles traveled. However, the No Project/DSAP Development Alternative would have substantially less residential development, and so may result in greater per capita vehicle miles traveled as fewer people would be able to live in close proximity to the office uses and to the Diridon Station transit hub. Also like the proposed project, this alternative would result in less-than-significant impacts along transit corridors and in adjacent jurisdictions with implementation of transportation demand management (TDM) mitigation, consistent with the Transportation and Parking Management Plan prepared for the DSAP.

Ability to Meet Project Objectives

The No Project/DSAP Development Alternative would partly address the City's goals with respect to buildout under the General Plan and the DSAP. (It is noted that the City is currently studying revisions to the DSAP, as discussed in Chapter 2, *Project Description*.) However, this alternative would not address the stated objectives of either the project applicant or the City for the project site, as memorialized in the MOU dated December 4, 2018. This MOU called for creating a vibrant,

[6] The DSAP EIR found that the DSAP would contribute considerably to the significant unavoidable impact identified in the General Plan EIR as a result of implementing the General Plan's core objective of increasing jobs relative to housing in San José to reduce the city's current jobs-housing imbalance (shortage of jobs relative to housing). Because the General Plan EIR evaluated a worst-case scenario in which all of new workers in San José beyond the number in regional forecasts were assumed to live outside of Santa Clara County, it concluded that implementation of the General Plan would substantially increase VMT per service population in the Bay area.

welcoming, and accessible urban destination on the project site, and envisioned substantial new employment and housing, including affordable housing, with the City "collaborating with the project applicant to innovate in the development of an urban destination that will bring opportunity to the local community and create new models for urban and workplace design and development." Developing the project under the framework of the already adopted DSAP would to some extent prevent in-depth collaboration to create an innovative and cohesive plan. For example, the DSAP's road network would likely preclude the project's integration of development with a re-conceived road network, which creates more public open space while also meeting the project's objective of creating contiguous, horizontally connected office spaces.

In addition, with significantly reduced housing overall (695 units compared to the project's up to 5,900 units), affordable housing would also be expected to be reduced. The increase in employment would be similarly reduced, to just over 20,000 jobs, from the project's approximately 30,550 new jobs. The MOU also calls for a range of community benefits, including affordable housing. With reduced development of office space, which generally supports the financial feasibility of community benefits, including affordable housing, the ability of the No Project/DSAP Development Alternative to meet the MOU objective of community benefits would also be reduced.

This alternative also would not meet the applicant's core objective to accommodate the long-term expansion of its workforce and business operations in a Bay Area location anchored by public transportation, or any of the applicant's other objectives.

5.5.2 Alternative 2A: Historic Preservation Alternative

This alternative would retain, reuse, and avoid adverse effects on all nine of the historic resources identified within the project site (one of which is a grouping of three small residences considered a single resource), as compared to the proposed project, which would avoid adverse effects to three resources, as shown in Section 3.3, *Cultural Resources and Tribal Cultural Resources*, Figure 3.3-2.[7] Specifically, this alternative would not demolish any of the nine historic resources and would eliminate new construction on sites identified in Figure 2-3, *Land Use Plan*, as B1, F5 and the southern two-thirds of F1, as well as the northern half of H1. The Preservation Alternative would also not undertake non-historically conforming alterations to the former Hellwig Iron Works Building at 150 South Montgomery Street. This alternative would also reduce the size of new buildings proposed near historic resources, setting them back from the historic properties, and adaptively reuse, consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Secretary's Standards), all on-site historic resources as indicated in **Table 5-3**. General Plan land use designations, zoning designations, and height limits would be the same as under the proposed project, although building heights adjacent to historic resources would be reduced.

[7] The project would retain and reuse the former San Jose Water Company building (retention and reuse previously approved as part of a separate project), the significant components of the former Kearney Pattern Works and Foundry, and the Stephen's Meat Products sign; the Kearney Pattern Works and Stephen's Meat Products sign may be relocated within the project site. The project would also retain the Hellwig Iron Works building at 150 South Montgomery Street but would make additions and alterations inconsistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, a significant unavoidable impact

TABLE 5-3
DISPOSITION OF HISTORIC ARCHITECTURAL RESOURCES IN THE STUDY AREA UNDER THE HISTORIC PRESERVATION ALTERNATIVE

Address and Resource Name (Date)	Disposition under the Historic Preservation Alternative	Disposition under the Proposed Project
559 W. Julian Street (c. 1883) 563 W. Julian Street (c. 1894) 567 W. Julian Street (c. 1892)	Avoidance or adaptive reuse consistent with the Secretary's Standards (less than significant)	Demolition (significant and unavoidable with mitigation)
343 N. Montgomery Street, Advance Metal Spinning (1941)	Avoidance or adaptive reuse consistent with the Secretary's Standards (less than significant)	Demolition (significant and unavoidable with mitigation)
345 N. Montgomery Street, Circus Ice Cream (1944)	Avoidance or adaptive reuse consistent with the Secretary's Standards (less than significant)	Demolition (significant and unavoidable with mitigation)
55 S. Autumn Street, 57 S. Autumn Street, 40 S. Montgomery Street, Kearney Pattern Works and Foundry (1922, c. 1950s and c. 1993 expansion)	Avoidance or adaptive reuse of historic South Montgomery Street buildings consistent with the Secretary's Standards (less than significant)	Adaptive reuse and minor relocation of contributing 40 South Montgomery Street sections (less than significant with mitigation)
374 W. Santa Clara Street, San Jose Water Works (1934–1940)	Same as under the project[a]	Adaptive reuse (less than significant)
580 Lorraine Avenue, former union hall (1961)	Avoidance or adaptive reuse consistent with the Secretary of the Interior's Standards (less than significant)	Demolition (significant and unavoidable with mitigation)
150 S. Montgomery Street, Hellwig Ironworks/San José Taiko (c. 1935)	Avoidance or adaptive reuse consistent with the Secretary's Standards (less than significant)	Addition(s) and modifications inconsistent with the Secretary's Standards, adaptive reuse (significant and unavoidable with mitigation)
145 S. Montgomery Street, Sunlite Baking Co. (1936)	Avoidance or adaptive reuse consistent with the Secretary's Standards (less than significant)	Demolition (significant and unavoidable with mitigation)
Stephen's Meat Products Sign	Retention within project site (less than significant with mitigation)	Retention within project site (less than significant with mitigation)
237 N. Autumn Street, Dennis Residence (1870)	Same as under the project	New development nearby (less than significant)
65 Cahill Street, Southern Pacific Depot Historic District (Diridon Station) (1935)	Same as under the project	New development separated from district (less than significant)
Lakehouse Historic District	Same as under the project	New development nearby (less than significant)

NOTES:
[a] Adaptive reuse of the San Jose Water Works building approved separately as part of the Delmas Mixed-Use Development Project (File Nos. PDC15-051, PD15-061, PT16-012, and HP16-002).
c. = circa; Secretary's Standards = *Secretary of the Interior's Standards for Treatment of Historic Properties*
SOURCE: Data compiled by Environmental Science Associates in 2020

With these modifications to the treatment of historic resources on site and the reduced building program anticipated as a result, the Historic Preservation Alternative would include less overall development than the proposed project, as shown in Table 5-1. The proposed project's buildings are generally contemplated at their maximum heights allowable under FAA height restrictions, with certain densities assumed in order to meet the applicant's objectives of incorporating high-quality urban design and open spaces with varied form and scale, and of achieving high

environmental performance and comfort in its building. Therefore, with the retention of all of the project's historic resources and without altering the building typologies and urban design approach proposed under the project, some amount of program space could not be located elsewhere on site and would therefore be eliminated.

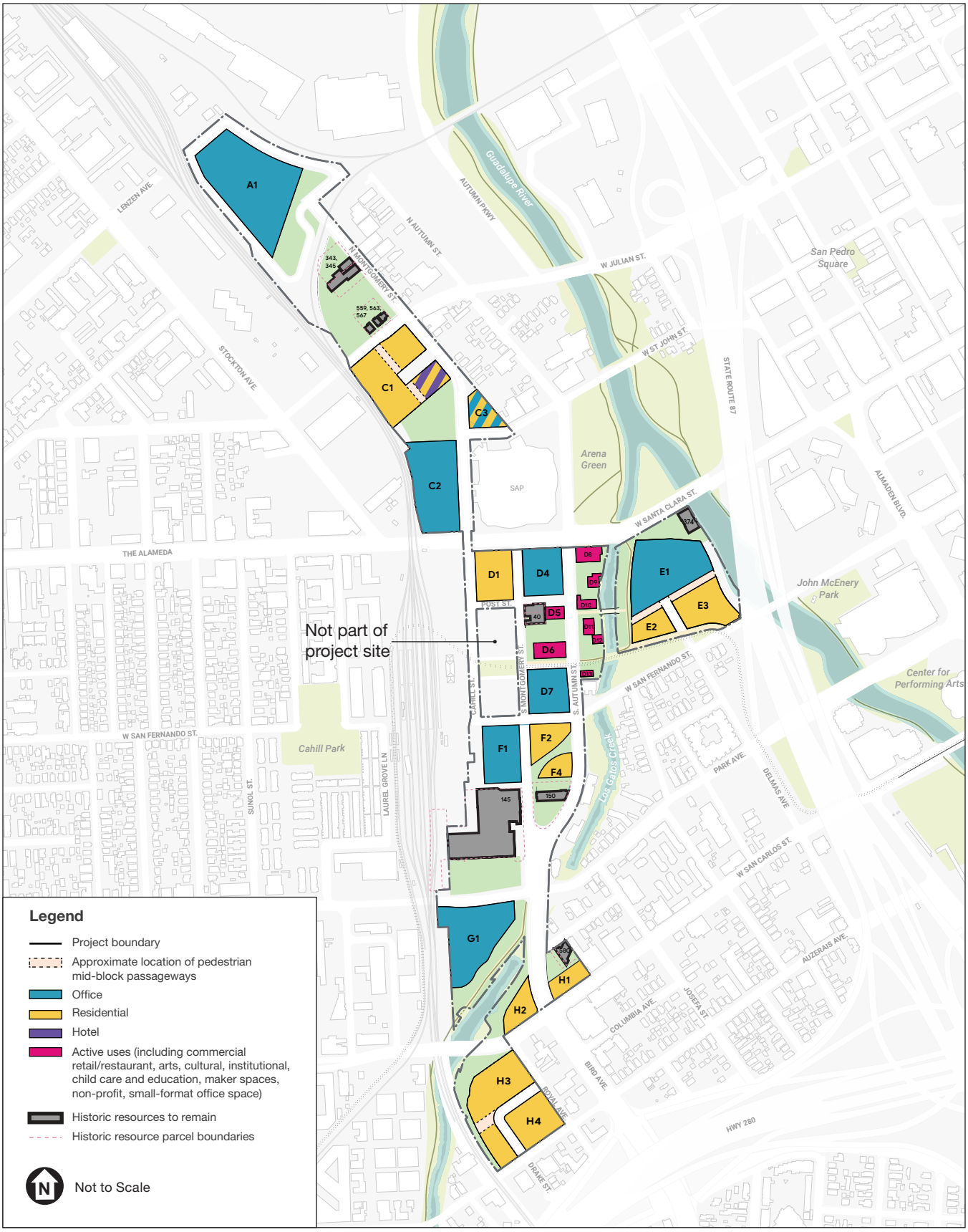
Specifically, the maximum number of residential dwelling units would be 5,665, approximately 235 units (4 percent) fewer than with the project due to preservation of 580 Lorraine Avenue affecting Block H1; the number of limited-term corporate accommodation units would be reduced by about 460 (58 percent), to a maximum of 340, due to reductions in residential and office buildings throughout the project site that would otherwise include such accommodations; and the maximum amount of office space would be reduced by about 1,610,000 gsf (22 percent), to 5,690,000 gsf, due to preservation of 145 South Montgomery Street and the three resources on North Montgomery Street/West Julian Street, as well as required setbacks from those resources for compatibility purposes, affecting Blocks B1, F1, F3, F4, F5, and F6. The floor area of active uses (e.g., commercial retail/restaurant, cultural, live entertainment, community center, institutional, childcare, and education), and infrastructure-related buildings would also be somewhat reduced, approximately in proportion to the loss of office uses, event/conference space would be cut in half, to 50,000 gsf, and the number of hotel rooms would be unchanged from the proposed project. The overall intensity of development, measured by building floor area, would be reduced by approximately 17 percent compared to the proposed project.

Other aspects of the project, including most of the proposed street network changes, open space, and infrastructure improvements, would generally remain the same or similar to the proposed project. Maximum building heights and the overall scale and density of the proposed project would also remain the same, except on Blocks B1, F1, F3, F4, F5, F6, and H1, where building footprints and/or massing would be altered to accommodate preservation of existing buildings. Unlike the project, the Historic Preservation Alternative would not eliminate South Montgomery Street south of West San Fernando Street or extend Cahill Street south to Park Avenue; instead, Cahill Street would dead-end at both the north and south sides of the historic Sunlite Baking Company (recently, AT&T) building at 145 South Montgomery Street. South Montgomery and South Autumn Streets would remain one-way streets as they function under existing conditions, and the proposed project's Meander open space, between West San Fernando Street and Park Avenue, would not be included due to preservation of 145 South Montgomery Street. **Figure 5-1** depicts the Historic Preservation Alternative.

Comparison of Environmental Impacts

Air Quality

Because the Historic Preservation Alternative would reduce the overall amount of development proposed by the project by approximately 17 percent, criteria pollutant emissions and health risks associated with TAC emissions would be somewhat reduced compared to the proposed project, as shown in **Table 5-4**. However, the reduction would not be sufficient to eliminate the project's significant and unavoidable impacts related to emissions of criteria pollutants during both construction and operation, because the incremental reduction in construction activity and overall development would not be sufficient to reduce impacts to a less-than-significant level.



SOURCE: Google LLC, 2020

Downtown West Mixed-Use Plan

Figure 5-1
Alternative 2A: Historic Preservation Alternative

TABLE 5-4
UNMITIGATED OPERATIONAL EMISSIONS OF CRITERIA POLLUTANTS—
COMPARISON OF ALTERNATIVE 2A TO THE PROPOSED PROJECT

	ROG	NO_X	PM_{10}	$PM_{2.5}$
Total Annual Emissions (tons per year)				
Significance Threshold	10	10	15	10
Proposed Project	**83**	**49**	**52**	**12**
Alternative 2A: Historic Preservation Alternative	**69**	**36**	**43**	**10**
Average Daily Emissions (pounds per day)				
Significance Threshold	54	54	82	54
Proposed Project	**471**	**306**	**327**	**77**
Alternative 2A: Historic Preservation Alternative	**392**	**227**	**270**	**61**

NOTES:
DSAP = Diridon Station Area Plan; NO_X = oxides of nitrogen; ROG = reactive organic gases; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; PM_{10} = particulate matter 10 microns or less in diameter

Mitigation measures included in the proposed project with mitigation include the following: MM AQ-2d: Super-Compliant VOC Architectural Coatings during Operations; MM AQ-2e: Best Available Emission Controls for Stationary Emergency Generators; MM AQ-2f: Operational Diesel Truck Emissions Reduction; MM AQ-2g: Electric Vehicle Charging; MM AQ-2h: Enhanced Transportation Demand Management Program.

SOURCE: Data compiled by Environmental Science Associates in 2020.

Like the project, this alternative would expose sensitive receptors to TAC and $PM_{2.5}$ concentrations during construction and operation of the project. Under this alternative, the severity of the impact would be reduced. Even with the mitigation measures identified for the proposed project, this alternative would likely result in a significant unavoidable impact with respect to increased lifetime cancer risk for off-site receptors, as would the project, because the magnitude of development would not be sufficiently lessened so as to reduce this impact to a less-than-significant level. However, the increased risk would be somewhat lower than the project-generated risk. For similar reasons, it is also anticipated that localized annual average $PM_{2.5}$ concentrations would remain significant and unavoidable under this alternative.

Biological Resources

With similar intensity, building footprints (with limited exceptions), and site improvements as the proposed project, the Historic Preservation Alternative would result in similar potential impacts on special-status bird, bat, and aquatic species; riparian habitat and wetlands along Los Gatos Creek; the creeping wild rye sensitive natural community; and fish habitat in the creek. Similar to the proposed project, impacts would be less than significant with implementation of the mitigation measures proposed for the project.

Cultural Resources and Tribal Cultural Resources

The Historic Preservation Alternative would avoid and/or adaptively reuse all buildings on the project site identified as historical resources, thereby avoiding the project's significant and unavoidable impacts relating to demolition of historic resources. The Historic Preservation Alternative also would not include additions and alterations to the historic Hellwig Ironworks building located at 150 South Montgomery, and would avoid the project's significant and

unavoidable impact on this resource. Under the Historic Preservation Alternative, any rehabilitation and adaptive reuse of the on-site historic architectural resources would be completed in accordance with the Secretary's Standards, subject to confirmation during the City's review of building plans for each individual property, resulting in a less-than-significant impact. Similar to the project, this alternative would also relocate and preserve the Stephen's Meats Dancing Pig Sign, which is a contributor to a pending Commercial Signage Discontiguous Historic District and, therefore, is considered a historic resource.

As noted above, new buildings proposed for the project site that would have the potential to affect the setting of identified historic resources would be designed carefully, and their massing would be altered if necessary, to avoid both the physical loss of historic resources and changes to their setting that would adversely affect their significance and integrity. Conformance review by the City pursuant to the project's Planned Development Permit and associated Design Standards and Guidelines would confirm the compatibility of proposed construction, resulting in a less-than-significant impact.

The Historic Preservation Alternative would include standard conditions of approval and project mitigation identified for archaeological resources, human remains, vibration impacts on adjacent and nearby historic buildings, and tribal cultural resources. With these mitigation measures, impacts on subsurface cultural resources and tribal cultural resources would be less than significant with mitigation, as with the project. Unlike the project, however, this alternative would avoid significant impacts on historic architectural resources on the project site; all such effects would be less than significant. Like the proposed project, this alternative would have a less than significant impact on the Southern Pacific Railroad Historic District. Cumulative impacts would also be less than significant because, based on the preceding conclusions, this alternative would not contribute considerably to cumulative effects on the Historic District, similar to the proposed project, and unlike the proposed project, this alternative would not contribute meaningfully to the previously identified cumulative impact on historical resources in Downtown.

Energy

With incrementally less development than the proposed project, the Historic Preservation Alternative would use less energy for construction and operations. Effects would be less than significant, as with the project.

Geology, Soils, Mineral Resources, and Paleontological Resources; Hazardous Materials

Because development would occur in the same area and on many of the same sites as under the project, the Historic Preservation Alternative would have similar effects as the proposed project. Impacts would be less than significant with the same mitigation measures as required under the proposed project.

Greenhouse Gas Emissions

Reuse of existing buildings can reduce GHG emissions when compared to new construction because there would be no emissions from new construction. The reduced development intensity

of the Historic Preservation Alternative compared to the proposed project would also reduce total construction-related and operational GHG emissions. The magnitude of the reduction in development intensity would be approximately 17 percent, and would not alter the conclusions of the project's GHG analysis. Similar to the proposed project, the impact of GHG emissions would remain less than significant when compared to the City's efficiency metrics for 2030 and 2040. While it is uncertain whether the existing AB 900 certification would continue to apply to this alternative, it is assumed for purposes of this discussion that it would be feasible to retain certification and that this alternative, like the proposed project, would achieve "no net new" emissions. As a result, this alternative would result in similar GHG impacts as the proposed project and GHG impacts would remain less than significant.

Hydrology and Water Quality

Although the Historic Preservation Alternative would result in incrementally less development than the proposed project, development would occur in the same area and on many of the same sites as under the project. Therefore, effects related to hydrology and water quality, including flooding impacts and effects on Los Gatos Creek and the Guadalupe River, would be incrementally less substantial those of the proposed project. Impacts would be less than significant with the same mitigation measures as required under the proposed project.

Land Use

The land uses proposed as part of the Historic Preservation Alternative are the same as those that would be located on site with the proposed project, although the building footprints on some blocks would be reduced and some existing buildings would be reused. Maximum building heights would remain the same, however, as would most of the proposed street network and open space areas. With these similarities to the project, the Historic Preservation Alternative would similarly avoid physically dividing an established community or conflicting with land use plans and policies. The impact of shade on Downtown parks would also remain less than significant, similar to the proposed project. Like the project, this alternative would have a significant unavoidable impact with respect to non-compliance with the CLUP airport noise exposure policy because it would include residential units that could have outdoor recreational space within the 65 dBA CNEL airport noise contour.

Noise and Vibration

The land uses proposed as part of the Historic Preservation Alternative would be the same as those under the project, and the intensity of development would be reduced, compared to the project, by approximately 17 percent because of the retention and reuse of existing buildings. With this reduction in intensity, noise impacts from construction and operation of this alternative could be somewhat less than the impacts of the proposed project; however, traffic noise would still affect sensitive receptors along three corridors. As under the project, this impact would be significant and unavoidable, assuming a uniform proportional reduction in traffic noise on all local streets, because traffic volumes would be only incrementally reduced, compared to those with the project. Also, even with less construction than under the proposed project, construction noise under the Historic Preservation Alternative would contribute to cumulative significant and

unavoidable construction noise impacts associated with BART construction near the project site, because the incremental decrease in development under this alternative, compared to the project, would still result in substantial construction activity over many years. Like the project, this alternative would have a significant unavoidable impact with respect to non-compliance with the CLUP airport noise exposure policy, as explained above under Land Use. Other noise and vibration impacts would be less than significant with mitigation, as under the proposed project.

Population and Housing

Like the proposed project, the Historic Preservation Alternative would not displace substantial numbers of people, because the site currently has very few residents. The Historic Preservation Alternative would add housing to the site, although somewhat less than the proposed project, and would result in a smaller increase in population and employment than the project. This increase would not conflict with adopted plans or policies, similar to the proposed project; however, like the project, it would have a cumulatively considerable contribution to the significant and unavoidable cumulative jobs/housing impact projected by 2040 under the General Plan.

Public Services, Recreation, and Utilities

Implementing the Historic Preservation Alternative would result in fewer residents and employees on site than under the proposed project, and thus a proportionally lower demand for public services, recreational facilities, and utilities. Like the project, this alternative would not result in significant impacts related to the need for new facilities or infrastructure for public services, recreation, or utilities; mitigation applicable to the proposed project would also apply.

Transportation

With less overall development than the proposed project, the Historic Preservation Alternative would generate about 20 percent less vehicle traffic and less use of transit, bike, and pedestrian facilities in the project area. This alternative would include most of the street network changes and pedestrian/bicycle improvements proposed by the project with the major exceptions of South Montgomery and South Autumn Streets through the core of the project area which would remain one-way streets. With the proximity of the site to Diridon Station and excellent access to transit, the Historic Preservation Alternative would not result in a significant impact related to vehicle miles traveled, similar to the proposed project. Like the proposed project, the Historic Preservation Alternative would not have significant impacts relating to conflicts with transportation policies, safety, emergency access, or mode share. Also like the proposed project, the Historic Preservation Alternative would result in less-than-significant impacts along transit corridors and in adjacent jurisdictions with implementation of TDM mitigation. Cumulative impacts would likewise be less than significant with mitigation.

Ability to Meet Project Objectives

This alternative would respond to a number of policies in the General Plan, including Policy LU-13.2 (preservation of candidate or designated landmark buildings, structures and historic objects), and Policy LU-13.6 (modifications to candidate or designated landmarks to

conform to the Secretary's Standards and/or appropriate State requirements). The alternative would also particularly address the project applicant's objective to "Preserve and adapt landmark historic resources and assets where feasible to foster a place authentic to San José and foster contemporary relations to San José's history."

The Historic Preservation Alternative would resemble the project in most respects, and would therefore meet most of the project objectives, although to a lesser extent than the proposed project. However, this alternative would result in approximately 17 percent less overall development, including a 4 percent (235-unit) reduction in the number of housing units, which would also reduce the amount of affordable housing. It would not advance, to the same degree, the City's objectives to develop the site in a way that aligns with the General Plan, DSAP, and Downtown Strategy 2040 goals to encourage ambitious job creation in close proximity to transit, or to advance the Diridon Station Area as a world-class transit hub and key transportation center for Northern California.

The Historic Preservation Alternative would include a mixed-use program somewhat comparable to that of the proposed project, although the mix of uses would be different. However, the retention of a number of historic resources, and the resulting removal or significant reduction of certain new-construction buildings in the Historic Preservation Alternative, as compared to the project, would result in less overall cohesion in the development plan. For example, the northern and southern ends of the project would likely be more isolated as a result of larger gaps in the development. Circulation improvements in the central area of the site would not be implemented, resulting in no southern extension of Cahill Street. Similarly, by retaining 145 South Montgomery Street, the proposed open space known as the Meander would not be built.

Economic growth and contribution to the City's tax base would be somewhat less compared to the proposed project, as the Historic Preservation Alternative would have a reduced office program compared to the proposed project, which is designed to realize the density gains encouraged by the City Council. The reduced office program would also limit or reduce the financial feasibility of delivering a range of community benefits, as sought by the MOU.

While office uses would also be generally grouped in order to achieve a balance of a vibrant mixed-use environment with efficiencies in shared program, the loss of certain office buildings under the Historic Preservation Alternative would reduce operational efficiencies, as well as the potential for future business operations to grow in place. The loss of office buildings at the northern and southern areas of the plan would reduce connectivity and the ability to share amenities. When compared to the proposed project, the alternative would eliminate some proposed large floorplate buildings, thereby reducing the project's ability to meet the objective of creating a dynamic range of floorplate types, including horizontally connected ones, that best suit the project applicant's need for workplace flexibility and for anticipating changing business needs and growth over the next several decades. This alternative, therefore, would not fully achieve the project applicant's objective to develop a dense commercial center that is anchored by (and better leverages) public transit infrastructure.

In addition, reduced development under the Historic Preservation Alternative could affect the layout and construction and reduce the efficiency of the project's proposed district infrastructure

systems, potentially achieving less in the way of efficiency than the proposed project. Shared infrastructure systems developed at a scale appropriate to the proposed project and the Historic Preservation Alternative are expected to require generally fixed or similar costs. Therefore, reduced overall development in the Historic Preservation Alternative would result in both lower efficiency for district systems, while impacting economic efficacy.

5.5.3 Alternative 2B: Historic Preservation/CLUP Noise Compliance Alternative

The Historic Preservation/CLUP Noise Compliance Alternative would combine aspects of the Preservation Alternative and the proposed project to avoid significant impacts to all but one of the historical resources on the project site and would also avoid significant noise and land use effects related to non-compliance with the CLUP airport noise exposure policy.

Like Alternative 2A, the Historic Preservation/CLUP Noise Compliance Alternative would retain and reuse all nine of the historical resources identified within the project site (one of which is a grouping of three small residences considered a single resource), as compared to the proposed project, which would avoid adverse effects to three of the nine resources. However, unlike the Historic Preservation Alternative, this alternative would include the proposed project's additions and alterations to the former Hellwig Iron Works Building at 150 South Montgomery to create an architectural icon. These changes are intended to create an architecturally iconic feature and, because this transformation would appear to alter the building form and affect its historic integrity, it would result in a significant and unavoidable impact, similar to the proposed project.

Similar to Alternative 2A, the Historic Preservation/CLUP Noise Compliance Alternative would reduce the size of new buildings proposed near historic resources when compared to the proposed project, setting them back from the historic properties. General Plan land use designations, zoning designations, and height limits would be the same as under the proposed project, although building heights adjacent to historic resources would be reduced.

With these modifications to the treatment of historic resources and the resulting reduced building program, the Historic Preservation/CLUP Noise Compliance Alternative would include less overall development than the proposed project, as shown in Table 5-1. Notably, the Historic Preservation/CLUP Noise Compliance Alternative would retain most of the proposed project's non-residential development program, while substantially reducing the number of residential units proposed and making a smaller reduction in floor area of active uses. Specifically, this alternative would develop a maximum of 3,600 dwelling units, 2,300 (nearly 40 percent) fewer than with the project, and 436,000 gsf of active uses, about 13 percent less than the project. Unlike the proposed project, no residential uses would be developed on Blocks E2, E3, F2, F4, H2, or (potentially) H3. Instead, these blocks would be developed with office space.

With these realignments of the land use plan, this alternative would develop 7.3 million gsf of office space, 300 hotel rooms, 800 units of limited-term corporate accommodation, 100,000 gsf of conference/event space, and 230,000 gsf devoted to infrastructure and utilities; all of these totals would be the same as under the proposed project. This alternative would also include about 15 acres

of open space as under the project. The reduction in the number of residential units would avoid most development of new residential units within the 65 dBA CNEL airport noise contour. Unlike the proposed project, under this alternative, there would be no residential development on Blocks E1, E2, or E3 (the former San José Water Company site), while the relatively small number of residential units that would be along the North Montgomery Street façade of Block C1—where the 65 dBA CNEL airport noise contour line runs just inside the property lines along the west side of North Montgomery Street—would not include patios, balconies, or other outdoor spaces.

Other aspects of the project, including most of the proposed street network changes, open space, and infrastructure improvements, would generally be similar under this alternative. Maximum building heights and the overall scale and density of the proposed project would also remain the same, except on Blocks B1, F1, F3, F4, F5, F6, and H1, where building footprints and/or massing would be altered to accommodate preservation of existing buildings. Similar to Alternative 2A and unlike the project, this alternative would not eliminate South Montgomery Street south of West San Fernando Street or extend Cahill Street south to Park Avenue; instead, Cahill Street would dead-end at both the north and south sides of the historic Sunlite Baking Company (recently, AT&T) building at 145 South Montgomery Street. South Montgomery and South Autumn Streets would remain one-way streets as they function under existing conditions, and the proposed project's Meander open space, between West San Fernando Street and Park Avenue, would not be included due to preservation of 145 South Montgomery Street. **Figure 5-2** depicts the Historic Preservation/CLUP Noise Compliance Alternative.

Comparison of Environmental Impacts

Air Quality

Because the Historic Preservation/CLUP Noise Compliance Alternative would reduce the overall amount of development proposed by the project by approximately 14 percent, criteria pollutant emissions and health risks associated with TAC emissions would be somewhat reduced compared to the proposed project, as shown in **Table 5-5**. However, the reduction would not be sufficient to eliminate the project's significant and unavoidable impacts related to emissions of criteria pollutants during both construction and operation, because the incremental reduction in construction activity and overall development would not be sufficient to reduce impacts to a less-than-significant level.

Like the project, this alternative would expose sensitive receptors to TAC and $PM_{2.5}$ concentrations during construction and operation of the project. Under this alternative, the severity of the impact would be reduced. Even with the mitigation measures identified for the proposed project, this alternative would likely result in a significant unavoidable impact with respect to increased lifetime cancer risk for off-site receptors, as would the project, because the magnitude of development would not be sufficiently lessened so as to reduce this impact to a less-than-significant level. However, the increased risk would be somewhat lower than the project-generated risk. For similar reasons, it is also anticipated that localized annual average $PM_{2.5}$ concentrations would remain significant and unavoidable under this alternative.

TABLE 5-5
UNMITIGATED OPERATIONAL EMISSIONS OF CRITERIA POLLUTANTS—
COMPARISON OF ALTERNATIVE 2B TO THE PROPOSED PROJECT

	ROG	NO_X	PM_{10}	$PM_{2.5}$
Total Annual Emissions (tons per year)				
Significance Threshold	10	10	15	10
Proposed Project	**83**	**49**	**52**	**12**
Alternative 2B: Historic Preservation CLUP Noise Compliance Alt.	**73**	**43**	**46**	**11**
Average Daily Emissions (pounds per day)				
Significance Threshold	54	54	82	54
Proposed Project	**471**	**306**	**327**	**77**
Alternative 2B: Historic Preservation CLUP Noise Compliance Alt.	**416**	**270**	**290**	**68**

NOTES:
DSAP = Diridon Station Area Plan; NO_X = oxides of nitrogen; ROG = reactive organic gases; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; PM_{10} = particulate matter 10 microns or less in diameter

Mitigation measures included in the proposed project with mitigation include the following: MM AQ-2d: Super-Compliant VOC Architectural Coatings during Operations; MM AQ-2e: Best Available Emission Controls for Stationary Emergency Generators; MM AQ-2f: Operational Diesel Truck Emissions Reduction; MM AQ-2g: Electric Vehicle Charging; MM AQ-2h: Enhanced Transportation Demand Management Program.

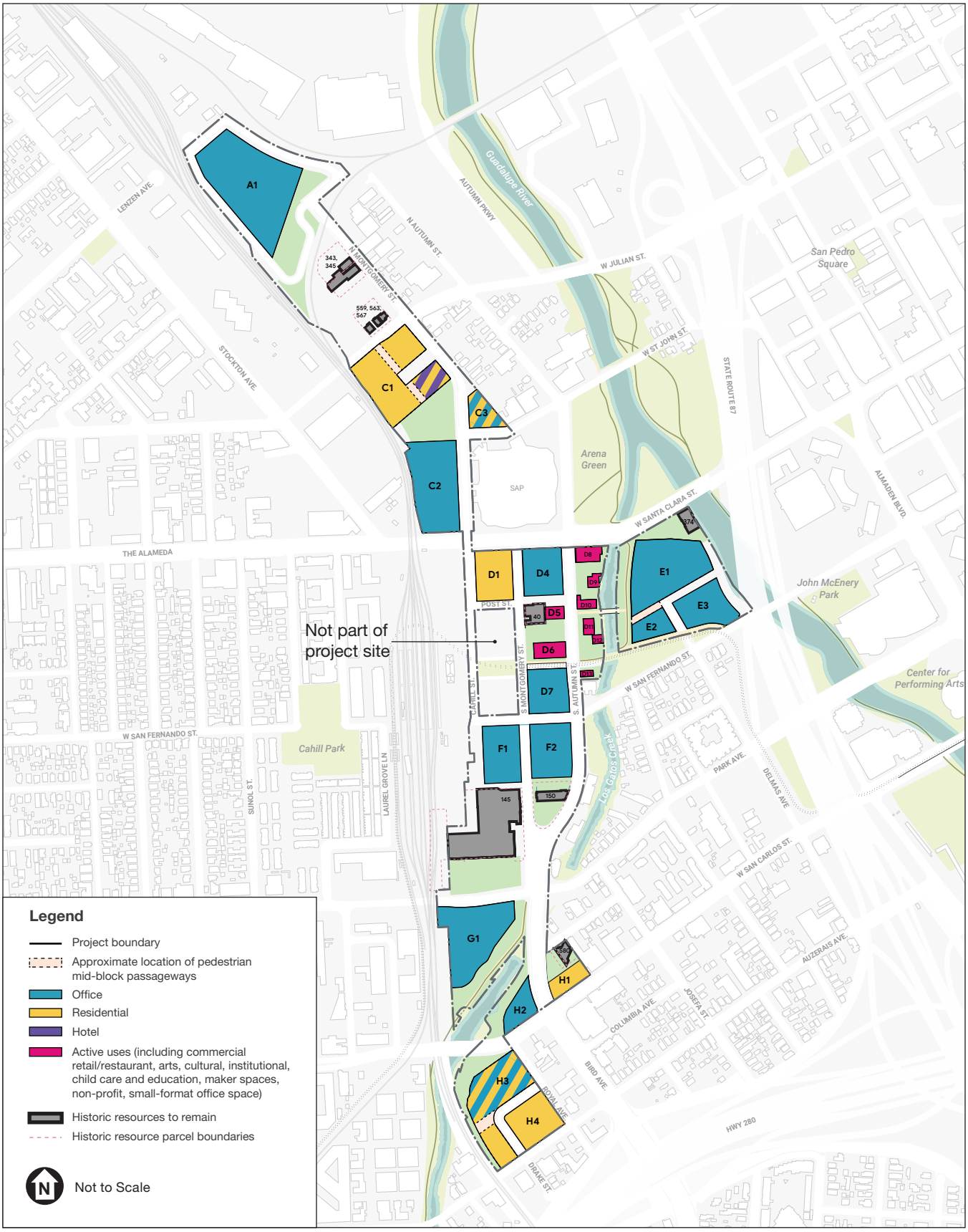
SOURCE: Data compiled by Environmental Science Associates in 2020.

Biological Resources

With similar intensity, building footprints (with limited exceptions), and site improvements as the proposed project, the Historic Preservation/CLUP Noise Compliance Alternative would result in similar potential impacts on special-status bird, bat, and aquatic species; riparian habitat and wetlands along Los Gatos Creek; the creeping wild rye sensitive natural community; and fish habitat in the creek. Similar to the proposed project, impacts would be less than significant with implementation of the mitigation measures proposed for the project.

Cultural Resources and Tribal Cultural Resources

The Historic Preservation/CLUP Noise Compliance Alternative would avoid adverse effects to eight of the nine buildings on the project site identified as historical resources. However, because it would include the proposed project's additional and alterations to the former Hellwig Iron Works building at 150 South Montgomery Street that would appear to alter the building form and affect its historic integrity, this alternative would have a significant and unavoidable impact on historic resources, like the project. The overall impact on historical resources would, however, be substantially reduced in severity compared to that with the proposed project. Under this alternative, rehabilitation and adaptive reuse of the remaining eight on-site historic architectural resources would be completed in accordance with the Secretary's Standards, subject to confirmation during the City's review of building plans for each individual property. Similar to the project, this alternative would also relocate and preserve the Stephen's Meats Dancing Pig Sign, which is a contributor to a pending Commercial Signage Discontiguous Historic District and, therefore, is considered a historic resource.



SOURCE: Google LLC, 2020

Downtown West Mixed-Use Plan

Figure 5-2
Alternative 2B: Historic Preservation/ CLUP Noise Compliance Alternative

As with Alternative 2A, new buildings proposed for the project site that would have the potential to affect the setting of identified historic resources would be designed carefully, and their massing would be altered if necessary, to avoid both the physical loss of historic resources and changes to their setting that would adversely affect their significance and integrity, thereby resulting in less-than-significant impacts with respect to these other resources. Conformance review by the City pursuant to the project's Planned Development Permit and associated Design Standards and Guidelines would confirm the compatibility of proposed construction, resulting in a less-than-significant impact.

The Historic Preservation/CLUP Noise Compliance Alternative would include standard conditions of approval and project mitigation identified for archaeological resources, human remains, vibration impacts on adjacent and nearby historic buildings, and tribal cultural resources. With these mitigation measures, impacts on subsurface cultural resources and tribal cultural would be less than significant with mitigation, as with the project. Like the proposed project, this alternative would have a less than significant impact on the Southern Pacific Railroad Historic District. Cumulative impacts would also be less than significant because, based on the preceding conclusions, this alternative would not contribute considerably to cumulative effects on the Historic District, similar to the proposed project, and unlike the proposed project, this alternative would not contribute meaningfully to the previously identified cumulative impact on historical resources in Downtown.

Energy

With incrementally less development than the proposed project, the Historic Preservation/CLUP Noise Compliance Alternative would use less energy for construction and operations. Effects would be less than significant, as with the project.

Geology, Soils, Mineral Resources, and Paleontological Resources; Hazardous Materials

Because development would occur in the same area and on many of the same sites as under the project, the Historic Preservation/CLUP Noise Compliance Alternative would have similar effects as the proposed project. Impacts would be less than significant with the same mitigation measures as required under the proposed project.

Greenhouse Gas Emissions

Reuse of existing buildings can reduce GHG emissions when compared to new construction because there would be no emissions from new construction. The reduced development intensity of the Historic Preservation/CLUP Noise Compliance Alternative compared to the proposed project would also reduce total construction-related and operational GHG emissions. The magnitude of the reduction in development intensity would be approximately 14 percent, and would not alter the conclusions of the project's GHG analysis. Similar to the proposed project, the impact of GHG emissions would remain less than significant when compared to the City's efficiency metrics for 2030 and 2040. While it is uncertain whether the existing AB 900 certification would continue to apply to this alternative, it is assumed for purposes of this discussion that it would be feasible to

retain certification and that this alternative, like the proposed project, would achieve "no net new" emissions. As a result, this alternative would result in similar GHG impacts as the proposed project and GHG impacts would remain less than significant.

Hydrology and Water Quality

Although the Historic Preservation/CLUP Noise Compliance Alternative would result in incrementally less development than the proposed project, development would occur in the same area and on many of the same sites as under the project. Therefore, effects related to hydrology and water quality, including flooding impacts and effects on Los Gatos Creek and the Guadalupe River, would be incrementally less substantial those of the proposed project. Impacts would be less than significant with the same mitigation measures as required under the proposed project.

Land Use

The land uses proposed as part of the Historic Preservation/CLUP Noise Compliance Alternative are the same as those that would be located on site with the proposed project, although the building footprints on some blocks would be reduced and some existing buildings would be reused. Maximum building heights would remain the same, however, as would most of the proposed street network and open space areas. With these similarities to the project, the Historic Preservation/CLUP Noise Compliance Alternative would similarly avoid physically dividing an established community or conflicting with land use plans and policies. The impact of shade on Downtown parks would also remain less than significant, similar to the proposed project. Unlike the proposed project, however, this alternative would have a less-than-significant effect with respect to non-compliance with the CLUP airport noise exposure policy because residential units would be either outside the 65 dBA CNEL airport noise contour or would not include patios, balconies, or other outdoor space, as described above in the description of this alternative. Therefore, the alternative would not be inconsistent with Policy N-4 and its restriction on residential outdoor uses within the noise contour. As such, this alternative would avoid the project's significant and unavoidable impact of the proposed project with respect to a conflict with a plan, policy, or regulation adopted for the purpose of avoiding an environmental effect, and the impact would be less than significant.

Noise and Vibration

The land uses proposed as part of the Historic Preservation/CLUP Noise Compliance Alternative would be the same as those under the project, and the intensity of development would be reduced, compared to the project, by approximately 14 percent because of the retention and reuse of existing buildings. With this reduction in intensity, noise impacts from construction and operation of this alternative could be somewhat less than the impacts of the proposed project; however, traffic noise would still affect sensitive receptors along three corridors. As under the project, this impact would be significant and unavoidable, assuming a uniform proportional reduction in traffic noise on all local streets, because traffic volumes would be only incrementally reduced, compared to those with the project. Also, even with less construction than under the proposed project, construction noise under the Historic Preservation/CLUP Noise Compliance Alternative would contribute to cumulative significant and unavoidable construction noise impacts associated

with BART construction near the project site, because the incremental decrease in development under this alternative, compared to the project, would still result in substantial construction activity over many years. As discussed above under Land Use, and unlike the proposed project, this alternative would not have a significant impact with respect to non-compliance with the CLUP airport noise exposure policy, and thus this alternative would avoid the project's significant unavoidable impact in this regard. Other noise and vibration impacts would be less than significant with mitigation, as under the proposed project.

Population and Housing

Like the proposed project, the Historic Preservation/CLUP Noise Compliance Alternative would not displace substantial numbers of people, because the site currently has very few residents. The Historic Preservation/CLUP Noise Compliance Alternative would add housing to the site, although only about 60 percent of the number of units in the proposed project, and would therefore result in a substantially smaller increase in population than the project. However, this alternative would generate only about 1 percent fewer employees than would the project, and it would therefore have a jobs-to-employed residents ratio of nearly 5.8, compared to approximately 3.5 with the proposed project. This increase would not conflict with adopted plans or policies, similar to the proposed project; however, like the project, it would have a cumulatively considerable contribution to the significant and unavoidable cumulative jobs/housing impact projected by 2040 under the General Plan.

Public Services, Recreation, and Utilities

Implementing the Historic Preservation/CLUP Noise Compliance Alternative would result in 40 percent fewer residents and slightly fewer employees on site than under the proposed project, and thus a proportionally lower demand for public services, recreational facilities, and utilities. Like the project, this alternative would not result in significant impacts related to the need for new facilities or infrastructure for public services, recreation, or utilities; mitigation applicable to the proposed project would also apply.

Transportation

With less overall development than the proposed project, the Historic Preservation/CLUP Noise Compliance Alternative would generate about 10 percent less vehicle traffic and less use of transit, bike, and pedestrian facilities in the project area. This alternative would include most of the street network changes and pedestrian/bicycle improvements proposed by the project with the major exceptions of South Montgomery and South Autumn Streets through the core of the project area which would remain one-way streets. With the proximity of the site to Diridon Station and excellent access to transit, the Historic Preservation/CLUP Noise Compliance Alternative would not result in a significant impact related to vehicle miles traveled, similar to the proposed project. Like the proposed project, the Historic Preservation/CLUP Noise Compliance Alternative would not have significant impacts relating to conflicts with transportation policies, safety, emergency access, or mode share. Also like the proposed project, the Historic Preservation/CLUP Noise Compliance Alternative would result in less-than-significant impacts along transit corridors and

in adjacent jurisdictions with implementation of TDM mitigation. Cumulative impacts would likewise be less than significant with mitigation.

Ability to Meet Project Objectives

This alternative would respond to a number of policies in the General Plan, including Policy LU-13.2 (preservation of candidate or designated landmark buildings, structures and historic objects), and Policy LU-13.6 (modifications to candidate or designated landmarks to conform to the Secretary of the Interior's Standards for Treatment of Historic Properties and/or appropriate State requirements). The alternative would also particularly address the project applicant's objective to "Preserve and adapt landmark historic resources and assets where feasible to foster a place authentic to San José and foster contemporary relations to San José's history."

The Historic Preservation/CLUP Noise Compliance Alternative would resemble the project in most respects, and would therefore meet most of the project objectives, although to a lesser extent than the proposed project. However, this alternative would result in approximately 14 percent less overall development, including a nearly 40 percent (2,300-unit) reduction in the number of housing units, which would also reduce the amount of affordable housing. The alternative would achieve the project's key objective to provide sufficient high-quality office space to accommodate the long-term expansion of its workforce and business operations in a Bay Area location that is anchored by public transportation, by allowing for up to 7.3 million gsf of office development. Retaining the office development under this alternative would also advance the key objective of providing economic vitality and an economically feasible project. Further, the alternative would achieve the City's policy objectives to promote development of Downtown as a regional job center, to intensify employment activities on sites in close proximity to transit facilities, and increasing jobs and economic development Downtown. However, this alternative would not meet the City's and the applicant's MOU objectives to develop housing, including affordable housing, to the same degree as the proposed project. The reduction in residential development also would not advance to the same degree as the proposed project the applicant's objective to develop housing at a sufficient density to maintain activity levels in the project site outside of normal business hours. This alternative would also reduce by about 13 percent the square footage of active uses developed on the project site, and thus would not advance, to the same degree, the City's objectives to develop the site in a way that aligns with the General Plan, DSAP, and Downtown Strategy 2040 goals to encourage ambitious job creation in close proximity to transit, or to advance the Diridon Station Area as a world-class transit hub and key transportation center for Northern California.

Similar to Alternative 2A, the Historic Preservation/CLUP Noise Compliance Alternative would include a mixed-use program somewhat comparable to that of the proposed project, although the mix of uses would be different. However, the retention of a number of historic resources, and the resulting removal or significant reduction of certain new-construction buildings in this alternative, as compared to the project, would result in less overall cohesion in the development plan. For example, the northern and southern ends of the project would likely be more isolated as a result of larger gaps in the development. Circulation improvements in the central area of the site would not be implemented, resulting in no southern extension of Cahill Street. Similarly, by retaining 145 South Montgomery Street, the proposed open space known as the Meander would not be built.

As with Alternative 2A, economic growth and contribution to the City's tax base would be somewhat less compared to the proposed project, as the Historic Preservation/CLUP Noise Compliance Alternative would have a reduced office program compared to the proposed project, which is designed to realize the density gains encouraged by the City Council.

Like Alternative 2A, the Historic Preservation/CLUP Noise Compliance Alternative would eliminate some proposed large floorplate buildings that would be developed under the proposed project, thereby reducing the project's ability to meet the objective of creating a dynamic range of floorplate types, including horizontally connected ones, that best suit the project applicant's need for workplace flexibility and for anticipating changing business needs and growth over the next several decades. This alternative, therefore, would not fully achieve the project applicant's objective to develop a dense commercial center that is anchored by (and better leverages) public transit infrastructure.

In addition, reduced development under the Historic Preservation/CLUP Noise Compliance Alternative could affect the layout and construction and reduce the efficiency of the project's proposed district infrastructure systems, potentially achieving less in the way of efficiency than the proposed project. Shared infrastructure systems developed at a scale appropriate to the proposed project and the Historic Preservation/CLUP Noise Compliance Alternative are expected to require generally fixed or similar costs. Therefore, reduced overall development in the Historic Preservation/CLUP Noise Compliance Alternative would result in both lesser efficiency for district systems, while impacting economic efficacy.

5.5.4 Alternative 3: 150 South Montgomery Street Preservation Alternative

This alternative would be identical to the proposed project with one exception: it would not include the proposed project's alterations and additions to the building at 150 South Montgomery Street (historic Hellwig Ironworks), whereby the building would be expanded vertically or horizontally, to the south (or both), to accommodate new arts and cultural use in an addition of up to approximately 8,500 square feet. This alternative is identified in addition to the Historic Preservation Alternatives to address the particular nature of the proposed project's impacts to 150 South Montgomery Street.[8]

The proposed project would build on the characteristics of the existing building, such as its brick construction, angled roof, and orientation, and construct a contemporary addition to create an iconic new center at the heart of the project site, adjacent to open space in the Meander and, as a result, would not comply with the Secretary's Standards. In contrast, under this alternative, the 150 South Montgomery Street building would instead be preserved and/or rehabilitated and adaptively reused in compliance with the Secretary's Standards. Like the proposed project, this alternative would adaptively reuse the former San Jose Water Company building at 374 West Santa Clara Street and the major portion of the historic former Kearney Pattern Works and Foundry building at 40 South Montgomery Street, along with the Stephen's Meat Products sign,

[8] 150 South Montgomery Street would also be preserved under the Historic Preservation Alternatives.

which would be retained and relocated within the site. Also like the project, this alternative would demolish the other five historic resources identified within the project site (one of which is a grouping of three small residences considered a single resource). Land use designations and height limits would be the same as under the proposed project. as would the proposed development program, as the program space identified for addition(s) to the 150 South Montgomery Street building would be developed elsewhere on the project site.

Comparison of Environmental Impacts

Cultural Resources and Tribal Cultural Resources

Impacts of this alternative would be virtually identical to those of the proposed project, with the exception of Impact CU-3 (additions and modifications to 150 South Montgomery Street). With the project, this impact would be significant and unavoidable, because the purpose of the alterations would be to create an architecturally iconic feature and this transformation would appear to alter the building form and affect its historic integrity, thereby resulting in a significant unavoidable impact. With this alternative, the impact would be less than significant with mitigation because under this alternative, the 150 South Montgomery Street building would be preserved and/or rehabilitated and adaptively reused in compliance with the Secretary's Standards. Similar to the proposed project, effects of this alternative on archaeological resources and tribal cultural resources would be less than significant with mitigation.

Other Impacts

No other impacts would be meaningfully different than those of the project. The level of construction activity would be virtually the same compared to that with the project, as the development associated with the project's proposed addition (up to approximately 8,500 square feet) would be relocated elsewhere on the project site, and any minor decrease in construction activity would not measurably decrease air quality or noise impacts. Similarly, the minor redistribution of traffic, should it occur, would not measurably change transportation impacts.

Ability to Meet Project Objectives

The 150 South Montgomery Street Preservation Alternative would allow both the City and the project applicant to meet virtually all project objectives, except that the project would likely not include the "world-class, architecturally iconic civic/cultural center for the City of San José" envisioned by project designers due to the site's proposed "combination and juxtaposition of historic and contemporary design elements." Under this alternative, the applicant's objectives to build a place that is "of San José" through high-quality urban design, fostering contemporary connections to San José's history, and creating places that foster arts and cultural uses, would be achieved, although not to the same degree as with the proposed project. While arts and cultural uses would be anticipated elsewhere on the site, they would not be anticipated in an iconic, contemporary interpretation of a historic building. They also would not be as located centrally on the project site in a spot adjacent to a major new open space such as the Meander, reducing the ability of such uses to create an iconic architectural moment.

5.5.5 Alternative 4: Reduced Office Alternative

This alternative would include the same amount of housing as the proposed project and a reduced amount of commercial office space, and is intended to reduce the project's contribution to the cumulative jobs/housing impact identified in Section 3.11, *Population and Housing*, as well as potential effects related to growth inducement that are identified in Chapter 4, *Other CEQA Issues*. Land use designations would be the same as under the proposed project. Assuming the same development footprint as the proposed project with a reduced amount of commercial office space, heights of office buildings in the Reduced Office Alternative would be approximately 60 to 120 feet, compared to the proposed project's range of 160 to 290 feet.

The Reduced Office Alternative would include less overall development than the proposed project, as shown in Table 5-1. Specifically, this alternative would include a maximum of only 3 million gsf of office space (almost 60 percent less than the proposed project); in addition, the number of limited-term corporate accommodation rooms would be reduced by 60 percent, to a maximum of 320 rooms, while infrastructure-related building space would be reduced by approximately 30,000 gsf (13 percent) and the event/conference space would be reduced from 100,000 gsf to a maximum of 45,000 gsf. The Reduced Office Alternative would provide up to 5,900 dwelling units and up to 300 hotel rooms, which are the same maximum quantities as under the project. Active uses (e.g., commercial retail/restaurant, cultural, live entertainment, community center, institutional, childcare, and education) would be reduced to a maximum of approximately 225,000 gsf, in light of the reduction in employment density that would support active uses. The overall intensity of development, measured by building floor area, would be reduced by approximately 36 percent compared to the proposed project. Given the substantial reduction in the development program compared to the proposed project, this alternative would likely preserve one or more historical resources that would be adversely affected under the proposed project.

The amount of office reduction was determined by taking into account the project applicant's key objective of accommodating substantial long-term company growth as well as the goal of reducing the project's contribution to the cumulative jobs/housing impact identified in the General Plan EIR. The project, as proposed by the applicant, would have a jobs–to-employed residents ratio of 3.5. To achieve a ratio in the project that would maintain the City's ratio of 0.82 jobs to employed residents would have required reducing the office component to approximately 665,000 gsf.[9] Because this would completely alter the nature of the project and would not achieve the overarching objectives, it was found to be infeasible. A project with 3 million gsf of office space still allows for some company growth (although much less than the proposed project) and is considered potentially feasible, while coming closer to a balance of new jobs to new housing. This alternative would have a jobs-to-employed residents ratio of 1.5, or nearly 60 percent less than that of the proposed project and a ratio that is closer to that of many nearby jurisdictions, such as Santa Clara, Milpitas, and Mountain View.

[9] This calculation and the ratios presented below use the ratio of approximately 1.5 employed residents per dwelling unit for four Downtown census tracts (5008, 5009.1, 5009.2, and 5010), including the tract that includes the project site (5008).

Comparison of Environmental Impacts

Air Quality

Because the Reduced Office Alternative would reduce the overall amount of development proposed by the project by approximately 36 percent and would reduce active uses, including retail and restaurant space, by 55 percent, criteria pollutant emissions and health risks associated with TAC emissions would be reduced compared to the proposed project (see **Table 5-6**).

TABLE 5-6
UNMITIGATED OPERATIONAL EMISSIONS OF CRITERIA POLLUTANTS—
COMPARISON OF ALTERNATIVE 4 TO THE PROPOSED PROJECT

	ROG	NO_X	PM_{10}	$PM_{2.5}$
Total Annual Emissions (tons per year)				
Significance Threshold	10	10	15	10
Proposed Project	**83**	**49**	**52**	**12**
Alternative 4: Reduced Office Alternative	**55**	**28**	**33**	7
Average Daily Emissions (pounds per day)				
Significance Threshold	54	54	82	54
Proposed Project	**471**	**306**	**327**	**77**
Alternative 4: Reduced Office Alternative	**312**	**172**	**207**	50

NOTES:
DSAP = Diridon Station Area Plan; NO_X = oxides of nitrogen; ROG = reactive organic gases; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; PM_{10} = particulate matter 10 microns or less in diameter

Mitigation measures included in the proposed project with mitigation include the following: Mitigation Measures AQ-2d, Super-Compliant VOC Architectural Coatings during Operations; AQ-2e, Best Available Emission Controls for Stationary Emergency Generators; AQ-2f, operational Diesel Truck Emissions Reduction; AQ-2g, Electric Vehicle Charging; AQ-2h, Enhanced Transportation Demand Management Program.

SOURCE: Data compiled by Environmental Science Associates in 2020.

However, the reduction would not be sufficient to eliminate the project's significant and unavoidable impacts related to criteria pollutant emissions during both construction and operation, although the volume of $PM_{2.5}$ emissions during project operations would be less than significant, unlike the case with the project. Like the project, this alternative would expose sensitive receptors to substantial TAC and $PM_{2.5}$ concentrations during construction and operation of the project, although the severity of the impact would be reduced due to the overall lesser amount of development. This alternative would likely result in a significant unavoidable impact with respect to increased lifetime cancer risk for off-site receptors, as would the project, although the increased risk would be considerably lower than the project-generated risk. This is because, while no health risk assessment has been prepared for this alternative, it is conservatively assumed that the reduction in emissions of cancer-causing toxic air contaminants, compared to emissions with the project, would not be sufficiently great as to reduce this impact to a less-than significant level because the development program would still constitute large-scale redevelopment of the project site that would likely involve many years of ongoing construction, using diesel-powered equipment, proximate to sensitive receptors. For similar reasons, it is also anticipated that localized annual average $PM_{2.5}$ concentrations would likely remain significant and unavoidable with mitigation under the Reduced Office Alternative.

Biological Resources

With similar building footprints, and site improvements as the proposed project, the Reduced Office Alternative would result in similar potential impacts on special-status bird, bat, and aquatic species; riparian habitat and wetlands along Los Gatos Creek; the creeping wild rye sensitive natural community; and fish habitat in the creek. Similar to the proposed project, these impacts would be less than significant with implementation of the mitigation measures proposed for the project.

Cultural Resources and Tribal Cultural Resources

Like the proposed project, the Reduced Office Alternative would involve development on a site that contains historic architectural resources. Given the overall reduction in development intensity, it would potentially be feasible to accommodate the Reduced Office Alternative while preserving one or more of the historic resources proposed to be demolished for the proposed project. However, in the absence of a detailed development plan for this alternative and without an explicit historic preservation objective, it is assumed that one or more historic architectural resources on the project site could be demolished and/or altered such that its historic importance would be substantially impaired. Mitigation measures recommended for the project could reduce the severity of this impact, but not necessarily to a less-than-significant level. Although these impacts would likely be less substantial than with the proposed project, they are conservatively assumed to remain significant and unavoidable, both individually and cumulatively. Similar to the proposed project, effects of this alternative on archaeological resources and tribal cultural resources would be less than significant with mitigation.

Energy

With somewhat less development than the proposed project, the Reduced Office Alternative would use less energy for construction and operations. Effects would be less than significant, as with the project.

Geology, Soils, Mineral Resources, and Paleontological Resources; Hazardous Materials

Because development would occur in the same area and on many of the same sites as under the project, the Reduced Office Alternative would have similar effects as the proposed project. Impacts would be less than significant with the same mitigation measures as required under the proposed project.

Greenhouse Gas Emissions

The Reduced Office Alternative would result in lower total construction-related and operational GHG emissions than the proposed project because less overall construction and less development would occur on the site. With these reduced emissions, it is likely that this alternative would meet the City's efficiency metric thresholds for 2030 and 2040, similar to the proposed project, given the transit-accessible location of the site. However, it should be noted that a robust Transportation Demand Management program, similar to the project's, would likely be needed for this alternative to comply with the efficiency metric. The Reduced Office Alternative is materially different from the proposed project as certified under AB 900, and therefore would not be

anticipated to meet AB 900's "no net additional" emissions requirement. As a result, although GHG impacts would likely remain less than significant, this alternative would result in greater GHG impacts than the proposed project.

Hydrology and Water Quality

Although the Reduced Office Alternative would result in somewhat less development than the proposed project, development would occur in the same area and on many of the same sites as under the project. Therefore, effects related to hydrology and water quality, including flooding impacts and effects on Los Gatos Creek and the Guadalupe River, would be somewhat less substantial than those of the proposed project. Impacts would be less than significant with the same mitigation measures as required under the proposed project.

Land Use

Land uses developed under the Reduced Office Alternative would be the same as those under the proposed project, although the office uses would be developed at lower densities, and likely in smaller buildings. Building heights would be lower, while the proposed street network and open space areas would be the same as the proposed project. With these similarities to the project, the Reduced Office Alternative would similarly avoid physically dividing an established community or conflicting with land use plans and policies. The impact of shade on Downtown parks would likely be lower than the proposed project, and would also remain less than significant, similar to the proposed project. Like the project, this alternative would have a significant unavoidable impact with respect to non-compliance with the CLUP airport noise exposure policy.

Noise and Vibration

The land uses proposed as part of the Reduced Office Alternative would be the same as those under the project, although the intensity of development would be reduced by approximately 36 percent compared to the project by reducing the amount of office space proposed. With this reduction in intensity, noise impacts from construction and operation of the alternative could be somewhat less than impacts under the proposed project. However, traffic noise would still affect sensitive receptors along three corridors; as under the project, this impact would be significant and unavoidable, assuming a uniform proportional reduction in traffic noise on all local streets. Also, even with less construction than under the proposed project, construction noise from the Reduced Office Alternative would contribute to cumulative significant and unavoidable construction noise impacts associated with BART construction near the project site, because even an approximately one-third decrease in development under this alternative, compared to the project, would still result in substantial construction activity over many years. Like the project, this alternative would have a significant unavoidable impact with respect to non-compliance with the CLUP airport noise exposure policy. Other noise and vibration impacts would be less than significant with mitigation, as under the proposed project.

Population and Housing

Like the proposed project, the Reduced Office Alternative would not displace substantial numbers of people, because the site currently has very few residents. The Reduced Office

Alternative would result in the same increase in residential population as the project, but a lesser employment increase. Similar to the proposed project, this increase would not conflict with adopted plans or policies. Unlike the project, this alternative would contribute only marginally to the cumulative significant and unavoidable jobs/housing ratio impact projected to occur by 2040 under the General Plan, reducing this impact to a less-than-significant level. Because this alternative would result in approximately 13,100 jobs and about 8,850 employed residents based on existing conditions, it would likely result in proportionally fewer employees who would commute to the project site from other areas and therefore would be anticipated to contribute less significantly to indirect cumulative environmental impacts associated with those commutes.

Public Services, Recreation, and Utilities

Implementing the Reduced Office Alternative would result in fewer employees on site than under the proposed project, and thus a somewhat lower demand for public services, recreational facilities, and utilities. Like the project, this alternative would not result in significant impacts related to the need for new facilities or infrastructure; mitigation applicable to the proposed project would also apply.

Transportation

With less overall development, and particularly office development, than under the proposed project, the Reduced Office Alternative would generate about 40 percent less vehicle traffic. The alternative would not be anticipated to include the street network changes and pedestrian/bicycle improvements proposed by the project, as such circulation improvements are generally contemplated in association with the denser development program of the proposed project. With the proximity of the site to Diridon Station and excellent access to transit, the Reduced Office Alternative would not result in a significant impact related to vehicle miles traveled, as would be the case with the proposed project. Also like the proposed project, the Reduced Office Alternative would result in less-than-significant impacts along transit corridors and in adjacent jurisdictions with implementation of TDM mitigation.

Ability to Meet Project Objectives

The Reduced Office Alternative would resemble the project in some respects, however it would substantially reduce the amount of office space proposed with the project, and would therefore only meet some of the project objectives. It would not do as much to further the City's goals, as expressed in the General Plan, the DSAP and Downtown Strategy 2040, of substantially increasing the ratio of jobs to housing in the Downtown area. It would also not advance, to the same degree, the City's objectives to develop the site in a way that aligns with the General Plan, DSAP, and Downtown Strategy 2040 goals to encourage ambitious job creation in close proximity to transit, or to advance the Diridon Station Area as a world-class transit hub and key transportation center for Northern California.

In addition, with less than half of the office program as that of the proposed project, the Reduced Office Alternative would have a proportionally reduced community benefits program, as described in the MOU—including affordable housing, which would similarly be anticipated to be

less than half of the amount to be delivered in the proposed project, and would provide reduced economic benefits and property tax revenue to the City.

With nearly 60 percent less office space than the proposed project, the alternative would not meet the applicant's core objective to accommodate the long-term expansion of its workforce and business operations in a Bay Area location anchored by public transportation. The Reduced Office Alternative, like the Historic Preservation Alternative, would not include certain large floorplate office buildings, given the substantial reduction in office space compared to the project, especially to the extent that this alternative would preserve one or more of the historic resources proposed for demolition with the proposed project. This could result in lesser workplace flexibility, contiguity, and operational efficiencies than would the proposed project. This alternative could also reduce the environmental performance and economic viability of district infrastructure systems, compared to the proposed project, reducing this alternative's ability to meet the project objective to achieve outstanding environmental performance.

5.5.6 Alternative 5: Reduced Intensity Alternative

As explained in Section 5.4, *Alternatives Evaluated but Rejected*, the scale of the project would need to be reduced by nearly 90 percent to avoid all of the project's significant and unavoidable impacts related to operational emissions of criteria air pollutants. Such an alternative was deemed infeasible. However, the Reduced Intensity Alternative was developed to reduce project operational emissions in a meaningful way, while maintaining a similar proportional mix of office, residential, and active uses as the proposed project. Like the Reduced Office Alternative, this alternative would reduce office uses to approximately 3 million square feet, but unlike the Reduced Office Alternative, it would also reduce residential (and other) uses in a similar proportion. This alternative would thus reduce, but not avoid the project's significant impact with respect to operational emissions of criteria air pollutants.

Compared to the proposed project, the Reduced Intensity Alternative would include approximately 58 percent less overall development, measured by building floor area, as shown in Table 5-1. Specifically, this alternative would include a maximum of 3.0 million gsf of office space, up to 2,655 dwelling units, a maximum of 150,000 gsf of active uses (e.g., commercial retail/restaurant, cultural, live entertainment, community center, institutional, childcare, and education), up to 135 hotel rooms, up to 320 units of limited-term corporate accommodation, a maximum of 45,000 gsf of event/conference space, and up to 127,000 gsf of infrastructure-related building space, as estimated by the project applicant. Given the substantial reduction in the development program compared to the proposed project, this alternative would likely not include demolition or substantial alteration of at least some of the historical resources that would be adversely affected under the proposed project.

This alternative could be developed in such a way as to spread the uses over the project site, thus resulting in less dense development, or could be developed at comparable density but not use as much land as the proposed project. Under the smaller footprint scenario, one or more other projects could be proposed for the remainder of the site, potentially by other developers; the

effects of this other development could be anticipated to be comparable to those of Alternative 1, the No Project/DSAP Development Alternative.

Comparison of Environmental Impacts

Air Quality

With just over 40 percent of the total square footage of the proposed project and an even greater reduction of 70 percent in active uses, including retail and restaurant space, the Reduced Intensity Alternative would result in substantially lower total emissions of criteria pollutants and TACs than the proposed project because it would include far less construction and total development at build-out (see **Table 5-7**). This alternative would reduce operational ROG, NO_X, and PM_{10} emissions compared to those of the project; however, as shown in Table 5-7, the impact would remain significant and unavoidable, as under the project. On the other hand, the volume of $PM_{2.5}$ emissions would be less than significant, unlike the case with the project. Criteria pollutant emissions from construction would also be reduced, but NOx emissions could remain significant and unavoidable even with mitigation, depending on construction phasing.

TABLE 5-7
UNMITIGATED OPERATIONAL EMISSIONS OF CRITERIA POLLUTANTS—
COMPARISON OF ALTERNATIVE 5 TO THE PROPOSED PROJECT

	ROG	NO_X	PM_{10}	$PM_{2.5}$
Total Annual Emissions (tons per year)				
Significance Threshold	10	10	15	10
Proposed Project	**83**	**49**	**52**	**12**
Alternative 5: Reduced Intensity Alternative	**35**	**18**	**22**	5
Average Daily Emissions (pounds per day)				
Significance Threshold	54	54	82	54
Proposed Project	**471**	**306**	**327**	**77**
Alternative 5: Reduced Intensity Alternative	**198**	**115**	**138**	31

NOTES:
DSAP = Diridon Station Area Plan; NO_X = oxides of nitrogen; ROG = reactive organic gases; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; PM_{10} = particulate matter 10 microns or less in diameter

Mitigation measures included in the proposed project with mitigation include the following: MM AQ-2d: Super-Compliant VOC Architectural Coatings during Operations; MM AQ-2e: Best Available Emission Controls for Stationary Emergency Generators; MM AQ-2f: Operational Diesel Truck Emissions Reduction; MM AQ-2g: Electric Vehicle Charging; MM AQ-2h: Enhanced Transportation Demand Management Program.

SOURCE: Data compiled by Environmental Science Associates in 2020.

TAC and $PM_{2.5}$ emissions during construction and operation of development occurring under the Reduced Intensity Alternative would also be less than those with the proposed project, as would pollutant concentrations at sensitive receptors. It is conservatively assumed that increased cancer risk and non-cancer chronic health effects would remain significant and unavoidable, even with mitigation, under this alternative, although the severity of this impact would be reduced compared to that of the project. This is because no health risk assessment has been prepared for this alternative, and therefore it is not possible to state with certainty that the reduction in emissions of

cancer-causing toxic air contaminants, compared to emissions with the project, would be sufficient to reduce this impact to a less-than significant level. Health risk does not correlate to pollutant emissions in a linear fashion; instead, health risks depend on factors such as location and timing of emissions, particularly peak construction emissions. It is also anticipated that the impact related to localized annual average $PM_{2.5}$ concentrations for on-site receptors would remain significant and unavoidable with mitigation, like the proposed project, although this alternative's impact would be reduced in severity due to lesser vehicular emissions during project operations.

Biological Resources

Development under the Reduced Intensity Alternative would involve construction on the project site, although at lower densities than under the proposed project, and without the coordinated development of site improvements and on-site utility systems. With less activity on the site, potential impacts on biological resources would be reduced; however, development would still occur and special-status bird, bat, and aquatic species could be affected, as could riparian habitat and wetlands along Los Gatos Creek, the creeping wild rye sensitive natural community, and fish habitat in the creek. As with the proposed project, mitigation measures recommended for the project would reduce these impacts to a less-than-significant level.

Cultural Resources and Tribal Cultural Resources

Like the proposed project, the Reduced Intensity Alternative would involve development on a site that contains historic architectural resources. Because this alternative would result in approximately 58 percent less development that the proposed project and nearly 50 percent less development than the Historic Preservation Alternative, which would avoid all significant impacts on historic architectural resources on the project site, it is likely that this alternative could also be designed to avoid such impacts. However, unlike the Preservation Alternative, preservation of historic resources is not an objective of this alternative, and the specific reductions in gross square footage have not been identified in a detailed plan. In the absence of a detailed development plan for this alternative and without an explicit historic preservation objective, it is assumed that one or more historic architectural resources on the project site could be demolished and/or altered such that its historic importance would be substantially impaired. Therefore, this analysis concludes that the impact would potentially be significant, both individually and cumulatively. As with the proposed project, mitigation measures recommended for the project could reduce the severity of this impact, but not to a less-than-significant level. Although these impacts would likely be less substantial than with the proposed project, they are conservatively assumed to remain significant and unavoidable, both individually and cumulatively. Similar to the proposed project, effects of this alternative on archaeological resources and tribal cultural resources would be less than significant with mitigation.

Energy

With substantially less development than the proposed project, the Reduce Intensity Alternative would use less energy for construction and operations, although it would likely not benefit as much from the project's energy efficiency that would be achieved through district utility systems. Effects would be less than significant, as with the project.

Geology, Soils, Mineral Resources, and Paleontological Resources; Hazardous Materials

Because development would occur in the same area and on many of the same sites as under the project, the Reduced Intensity Alternative would have similar effects as the proposed project. Impacts would be less than significant with the same mitigation measures as required under the proposed project.

Greenhouse Gas Emissions

The Reduced Intensity Alternative would result in fewer construction-related and operational GHG emissions than the proposed project because less overall construction and less development would occur on the site. With these reduced emissions, it is likely that this alternative would meet the City's efficiency metric thresholds for 2030 and 2040, similar to the proposed project, given the transit-accessible location of the site. However, it should be noted that a robust Transportation Demand Management program, similar to the project's, would likely be needed for this alternative to comply with the efficiency metric. The Reduced Intensity Alternative is materially different from the proposed project as certified under AB 900, and therefore would not be anticipated to meet AB 900's "no net additional" emissions requirement. As a result, although GHG impacts would remain less than significant, this alternative would likely result in greater GHG impacts than the proposed project.

Hydrology and Water Quality

Although the Reduced Intensity Alternative would result in substantially less development than the proposed project, development would occur in the same area and on many of the same sites as under the project. Therefore, effects related to hydrology and water quality, including flooding impacts and effects on Los Gatos Creek and the Guadalupe River, would be somewhat less substantial than those of the proposed project. Impacts would be less than significant with the same mitigation measures as required under the proposed project.

Land Use

The mix of land uses under the Reduced Intensity Alternative would be the same as those under the proposed project, although they would be developed at lower densities, and likely in smaller buildings. The alternative could consist of infill development, intensifying the use of an underused site, and with similar land uses to the proposed project, would not physically divide an established community. Development under the Reduced Intensity Alternative would be generally consistent with the General Plan, and would therefore not conflict with land use plans and policies. With less overall development and smaller buildings, shading on Downtown parks by the buildings proposed under this alternative could be less than under the proposed project; as under the project, the impact of new shadow on Downtown parks would also be less than significant. Like the project, this alternative would have a significant unavoidable impact with respect to non-compliance with the CLUP airport noise exposure policy because it would include residential units that could have outdoor recreational space within the 65 dBA CNEL airport noise contour.

Noise and Vibration

The Reduced Intensity Alternative would result in less overall development than the proposed project. Therefore, this alternative would therefore result in less construction noise, less noise from stationary sources like backup generators, and less noise from traffic along area roadways than would result from the proposed project. However, under the Reduced Intensity Alternative, traffic noise would still affect sensitive receptors along three corridors. As under the project, this impact would be significant and unavoidable, because traffic volumes would still increase substantially above existing volumes, assuming a uniform proportional reduction in traffic noise on all local streets. Even with less construction than under the proposed project, construction noise would contribute to cumulative significant and unavoidable construction noise impacts associated with BART construction near the project site, because even with substantially less development under this alternative, this alternative would still constitute large-scale redevelopment of the project site that would likely involve many years of ongoing construction. Like the project, this alternative would have a significant unavoidable impact with respect to non-compliance with the CLUP airport noise exposure policy, as explained above under Land Use. Other noise and vibration impacts would be less than significant with mitigation, as under the proposed project.

Population and Housing

Like the proposed project, the Reduced Intensity Alternative would not displace substantial numbers of people, because the site currently has very few residents. The Reduced Intensity Alternative would, however, add less additional housing to the site than would the project, and would result in a smaller increase in population and employment. Similar to the proposed project, this increase would not conflict with adopted plans or policies, but it could have a cumulatively considerable contribution to the cumulative significant and unavoidable jobs/housing impact projected by 2040 under the General Plan.

Public Services, Recreation, and Utilities

Implementing the Reduced Intensity Alternative would result in fewer residents and employees on site than under the proposed project, and thus a lower demand for public services, recreational facilities, and utilities. Like the project, this alternative would not result in significant impacts related to the need for new facilities or infrastructure for public services, recreational facilities, or utilities; mitigation applicable to the proposed project would also apply.

Transportation

With substantially less overall development than the proposed project, the Reduced Intensity Alternative would generate about 60 percent less vehicle traffic. The alternative likely would not include the street network changes and pedestrian/bicycle improvements proposed by the project, or at least not all such improvements; however, proposals included in the DSAP could be funded and implemented over time. With the proximity of the site to Diridon Station and excellent access to transit, the Reduced Intensity Alternative, like the proposed project, would not result in a significant impact related to vehicle miles traveled. Also like the proposed project, the Reduced Intensity Alternative would result in less-than-significant impacts along transit corridors and in adjacent jurisdictions with implementation of TDM mitigation.

Ability to Meet Project Objectives

The Reduced Intensity Alternative would achieve many of the objectives for the project site, although to a lesser degree than the proposed project. It would not advance, to the same degree, the City's objectives to develop the site in a way that aligns with the General Plan, DSAP, and Downtown Strategy 2040 goals to encourage ambitious job creation in close proximity to transit, or to advance the Diridon Station Area as a world-class transit hub and key transportation center for Northern California.

This alternative would not substantially address the stated objectives of either the project applicant or the City for the project site, as memorialized in the MOU dated December 4, 2018. This MOU called for creating a vibrant, welcoming, and accessible urban destination on the project site, and envisioned substantial new employment and housing, with the City "collaborating with the project applicant to innovate in the development of an urban destination that will bring opportunity to the local community and create new models for urban and workplace design and development." In addition, like the Historic Preservation Alternative and the Reduced Office Alternative, the Reduced Intensity Alternative would generate less in the way of community benefits, including affordable housing, and would provide reduced economic benefits and property tax revenue to the City than would the proposed project.

With nearly 60 percent less office space than the proposed project, the alternative would not meet the applicant's core objective to accommodate the long-term expansion of its workforce and business operations in a Bay Area location anchored by public transportation. Similarly, it would reduce the applicant's ability to create a dense commercial center and construct housing with sufficient density to maintain day and evening, weekday and weekend activity on the project site while offering a mix of unit types, sizes, and levels of affordability to accommodate a range of potential residents.

The Reduced Intensity Alternative, like the Historic Preservation Alternative and Reduced Office Alternative, would remove certain large floorplate office buildings, given the substantial reduction in office space compared to the project and preservation of some historic resources that would be demolished for the proposed project. This could result in lesser workplace flexibility, contiguity, and operational efficiencies than would the proposed project. This alternative could also reduce the environmental performance and economic viability of district infrastructure systems, compared to the proposed project, reducing this alternative's ability to meet the project objective to achieve outstanding environmental performance.

5.6 Comparison of Alternatives

CEQA requires a comparison of the alternatives to the project (presented above), and suggests that a matrix may be used to summarize the comparison. Accordingly, **Table 5-8** includes an overview of each alternative analyzed above and shows how the results of the analyses compare to the results of the analysis of the proposed project in Chapter 3.

TABLE 5-8
COMPARISON OF THE IMPACTS OF THE PROJECT AND ALTERNATIVES

Impact Statement	Project	Alternative 1: No Project/DSAP Development Alternative	Alternative 2A: Historic Preservation Alternative	Alternative 2B: Historic Preservation/ CLUP Noise Compliance Alternative	Alternative 3: 150 S. Montgomery Street Preservation Alternative	Alternative 4: Reduced Office Alternative	Alternative 5: Reduced Intensity Alternative
3.1 Air Quality							
Impact AQ-1: The project would not conflict with or obstruct implementation of the applicable air quality plan.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact AQ-2: The proposed project would result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	SU	SU ⇓	SU ⇓	SU ⇓	SU ⇔	SU ⇓	SU ⇓
Impact AQ-3: The proposed project would expose sensitive receptors to substantial pollutant concentrations.	SU	SU ⇓	SU ⇓	SU ⇓	SU ⇔	SU ⇓	SU ⇓
Impact AQ-4: Traffic associated with the development of the proposed project would not contribute to carbon monoxide concentrations exceeding the California ambient air quality standards of 9 parts per million averaged over eight hours and 20 parts per million for one hour.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact AQ-5: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓

IMPACT CODES:

NI = no impact
LTS = less than significant or negligible impact; no mitigation required
LTSM = less than significant or negligible impact, after mitigation
SU = significant and unavoidable adverse impact, after mitigation (where applicable)

COMPARISON:

⇔ Impact similar to that of project
⇑ Impact greater than that of project
⇓ Impact less than that of project

TABLE 5-8
COMPARISON OF THE IMPACTS OF THE PROJECT AND ALTERNATIVES

Impact Statement	Project	Alternative 1: No Project/DSAP Development Alternative	Alternative 2A: Historic Preservation Alternative	Alternative 2B: Historic Preservation/ CLUP Noise Compliance Alternative	Alternative 3: 150 S. Montgomery Street Preservation Alternative	Alternative 4: Reduced Office Alternative	Alternative 5: Reduced Intensity Alternative
Impact C-AQ-1: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area, would result in a cumulatively considerable contribution to significant cumulative regional air quality impacts.	SU	SU ⇓	SU ⇓	SU ⇓	SU ⇔	SU ⇓	SU ⇓
Impact C-AQ-2: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area, would result in a cumulatively considerable contribution to significant cumulative health risk impacts on sensitive receptors.	SU	SU ⇓	SU ⇓	SU ⇓	SU ⇔	SU ⇓	SU ⇓
3.2 Biological Resources							
Impact BI-1: The proposed project could have a substantial adverse effect, either directly, indirectly, or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS (western pond turtle, central California coast steelhead distinct population segment, nesting birds, special-status bats).	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓

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Impact BI-2: The proposed project could have a substantial adverse effect on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact BI-3: The proposed project could have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact BI-4: The proposed project could interfere substantially with the movement of a native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact BI-5: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔

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LTSM = less than significant or negligible impact, after mitigation
SU = significant and unavoidable adverse impact, after mitigation (where applicable)

COMPARISON:

⇔ Impact similar to that of project
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TABLE 5-8
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Impact Statement	Project	Alternative 1: No Project/DSAP Development Alternative	Alternative 2A: Historic Preservation Alternative	Alternative 2B: Historic Preservation/ CLUP Noise Compliance Alternative	Alternative 3: 150 S. Montgomery Street Preservation Alternative	Alternative 4: Reduced Office Alternative	Alternative 5: Reduced Intensity Alternative
Impact BI-6: The proposed project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔
Impact C-BI-1: The proposed project, in conjunction with other past, current, or foreseeable development in the project vicinity, could result in cumulative impacts on biological resources.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
3.3 Cultural Resources and Tribal Cultural Resources							
Impact CU-1: The proposed project would demolish historic architectural resources, resulting in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.	SU	SU ⇓	LTS ⇓	LTS ⇓	SU ⇓	SU ⇓	SU ⇓
Impact CU-2: The proposed project would relocate, construct an addition to, and adaptively reuse the historic portions of 40 South Montgomery Street (Kearney Pattern Works and Foundry). This could result in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔

IMPACT CODES:

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LTS = less than significant or negligible impact; no mitigation required
LTSM = less than significant or negligible impact, after mitigation
SU = significant and unavoidable adverse impact, after mitigation (where applicable)

COMPARISON:

⇔ Impact similar to that of project
⇑ Impact greater than that of project
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TABLE 5-8
COMPARISON OF THE IMPACTS OF THE PROJECT AND ALTERNATIVES

Impact Statement	Project	Alternative 1: No Project/DSAP Development Alternative	Alternative 2A: Historic Preservation Alternative	Alternative 2B: Historic Preservation/ CLUP Noise Compliance Alternative	Alternative 3: 150 S. Montgomery Street Preservation Alternative	Alternative 4: Reduced Office Alternative	Alternative 5: Reduced Intensity Alternative
Impact CU-3: The proposed project would construct one or more additions to and adaptively reuse 150 South Montgomery Street (Hellwig Ironworks). The proposed additions and modifications would result in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.	SU	SU ⇔	LTSM ⇓	LTSM ⇓	LTSM ⇓	SU ⇔	SU ⇔
Impact CU-4: The proposed project could result in significant impacts on historical resources resulting from construction-related vibrations.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact CU-5: The proposed project would not result in significant impacts on 374 West Santa Clara Street (San Jose Water Works) or the Southern Pacific Depot Historic District from modifications to the City Landmark designation boundaries.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔

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Impact CU-6: The proposed project would not result in significant impacts on 374 West Santa Clara Street (San Jose Water Works), 65 Cahill Street (the Southern Pacific Depot Historic District), the 19th century residences between North Montgomery and North Autumn Streets (160 North Montgomery Street and 195, 199, and 203 North Autumn Street), 237 North Autumn Street (Dennis Residence), 40 South Montgomery Street (Kearney Pattern Works and Foundry), and/or contributors to the Lakehouse Historic District including the individual historic architectural resources under CEQA of 396, 398, 416, and 454 West San Fernando Street and 124 Delmas Avenue from increased density of surrounding development, changes in adjacent land use, or changes in circulation patterns.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact CU-7: The proposed project could result in significant impacts at 105 South Montgomery Street (Stephen's Meat Projects sign), a historic resource, as a result of its removal, storage, and relocation within the project site.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔

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Impact CU-8: The proposed project could cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇓
Impact CU-9: The proposed project would disturb human remains, including those interred outside of formal cemeteries.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇓
Impact CU-10: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇓
Impact C-CU-1: The proposed project would make a cumulatively considerable contribution to previously identified significant cumulative adverse impacts on Downtown historical resources as defined in CEQA Guidelines Section 15064.5.	SU	SU ⇓	LTS ⇓	LTS ⇓	SU ⇓	SU ⇓	SU ⇓
Impact C-CU-2: The proposed project would not make a cumulatively considerable contribution to previously identified significant impacts on the Southern Pacific Depot historic district.	LTS	LTS ⇔	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇔	LTS ⇓

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Impact C-CU-3: The proposed project, in combination with past and foreseeable future projects, would not result in a cumulative adverse impact on 374 West Santa Clara Street (San Jose Water Works), a historic architectural resource as defined in CEQA Guidelines Section 15064.5.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔
Impact C-CU-4: The proposed project would combine with other projects to result in significant cumulative effects on archaeological resources as defined in CEQA Guidelines Section 15064.5; human remains, including those interred outside of formal cemeteries; and tribal cultural resources as defined in Public Resources Code Section 21074.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔
3.4 Energy							
Impact EN-1: The proposed project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓

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Impact EN-2: The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact C-EN-1: The proposed project would not result in a cumulatively considerable contribution to a significant energy impact.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
3.5 Geology, Soils, Mineral Resources, and Paleontological Resources							
Impact GE-1: The proposed project could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking; or seismic-related ground failure, including liquefaction.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔
Impact GE-2: The proposed project would not result in substantial soil erosion or the loss of topsoil.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔
Impact GE-3: The proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔

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Impact GE-4: The proposed project would not be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), that would create substantial direct or indirect risks to life or property.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔
Impact GE-5: The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇓
Impact C-GE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, could result in significant cumulative impacts related to geology, soils, or paleontology.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇓
3.6 Greenhouse Gas Emissions							
Impact GR-1: The proposed project could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact GR-2: The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔

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3.7 Hazardous and Hazardous Materials							
Impact HA-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal, or through reasonably foreseeable upset and accidental release of hazardous materials.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact HA-2: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact HA-3: The proposed project is located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔
Impact HA-4: The proposed project is located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, but would not result in a safety hazard or excessive noise for people residing or working in the project area.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔

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Impact HA-5: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔
Impact C-HA-1: The proposed project would not combine with other projects to result in significant cumulative impacts related to hazardous materials.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact C-HA-2: The proposed project would not combine with other projects to result in significant cumulative impacts related to proximity to airports.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔
Impact C-HA-3: The proposed project would not combine with other projects to result in significant cumulative impacts related to impairment of implementation of or physical interference with adopted emergency response or evacuation plans.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔
3.8 Hydrology and Water Quality							
Impact HY-1: The proposed project could violate a water quality standard or waste discharge requirement or otherwise substantially degrade surface or groundwater quality.	LTSM	LTSM ⇔	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓

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Impact HY-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	LTS	LTS ⇔	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact HY-3: The proposed project could substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇓
Impact HY-4: The proposed project could create or contribute runoff water that could exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇓
Impact HY-5: The proposed project could risk release of pollutants in a flood hazard, tsunami, or seiche zone due to project inundation.	LTSM	LTSM ⇔	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓

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Impact HY-6: The proposed project could conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	LTSM	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔	LTSM ⇔
Impact C-HY-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, could result in a considerable contribution to cumulative impacts on hydrology and water quality.	LTSM	LTSM ⇔	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact C-HY-2: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, could result in a considerable contribution to cumulative impacts related to potentially substantial decreases in groundwater supplies.	LTS	LTS ⇔	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact C-HY-3: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, could result in a considerable contribution to cumulative impacts related to flood hazards.	LTSM	LTSM ⇔	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
3.9 Land Use and Planning							
Impact LU-1: The proposed project would not physically divide an established community.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔

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Impact LU-2: The proposed project would cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	SU	SU ⇔	SU ⇔	LTSM ⇓	SU ⇔	SU ⇔	SU ⇔
Impact LU-3: The proposed project would not result in 10 percent or more of the area of any one of the six major open space areas in the Downtown San José area (St. James Park, Plaza of Palms, Plaza de Cesar Chavez, Paseo de San Antonio, Guadalupe River Park, McEnery Park) being newly shaded by the project.	LTS	LTS ⇓	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇓
Impact C-LU-1: The proposed project, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects within and in the vicinity of the project site, would not physically divide an established community.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔

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Impact C-LU-2: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would result in a significant cumulative impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	SU	SU ⇔	SU ⇔	LTSM ⇓	SU ⇔	SU ⇔	SU ⇔
Impact C-LU-3: The proposed project, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects within and in the vicinity of the project site, would not result in significant cumulative impacts related to shadow.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔
3.10 Noise and Vibration							
Impact NO-1a: Stationary sources associated with operation of the proposed project could result in generation of a permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓

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Impact NO-1b: Project-generated traffic noise would result in permanent increases in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	SU	SU ⇓	SU ⇓	SU ⇓	SU ⇔	SU ⇓	SU ⇓
Impact NO-1c: Construction of the proposed project could result in temporary increases in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	SU	SU ⇓	SU ⇓	SU ⇓	SU ⇔	SU ⇓	SU ⇓
Impact NO-2: The proposed project could result in the generation of excessive groundborne vibration or groundborne noise levels.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact NO-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the proposed project could expose people residing or working in the project area to excessive noise levels.	SU	SU ⇔	SU ⇔	LTSM ⇓	SU ⇔	SU ⇔	SU ⇔

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Impact NO-4 *(Non-CEQA noise impacts of the environment on the project)*: The project would not expose people residing or working within the project area to excessive noise levels.	NI	NI ⇓	NI ⇓	NI ⇓	NI ⇔	NI ⇓	NI ⇓
Impact NO-5 *(Non-CEQA vibration impacts of the environment on the project)*: The project could expose people residing or working within the project area to excessive groundborne vibration levels.	NI	NI ⇓	NI ⇓	NI ⇓	NI ⇔	NI ⇓	NI ⇓
Impact C-NO-1: Construction activities for the proposed project combined with cumulative construction noise in the project area would result in a substantial temporary or periodic increase in ambient noise levels in excess of standards established in the General Plan or Noise Ordinance.	SU	SU ⇓	SU ⇓	SU ⇓	SU ⇔	SU ⇓	SU ⇓
Impact C-NO-2: Operation of the proposed project when considered with other cumulative development would cause a substantial permanent increase in ambient noise levels in excess of standards established in the General Plan or Noise Ordinance.	SU	SU ⇓	SU ⇓	SU ⇓	SU ⇔	SU ⇓	SU ⇓
Impact C-NO-3: The proposed project would make a considerable contribution to exposure of people to excessive airport noise levels.	SU	SU ⇔	SU ⇔	LTSM ⇓	SU ⇔	SU ⇔	SU ⇔

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3.11 Population and Housing							
Impact PH-1: The proposed project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact PH-2: The proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔
Impact C-PH-1: The proposed project would result in a cumulatively considerable contribution to the citywide significant and unavoidable cumulative impact related to the jobs/housing imbalance identified in the 2040 General Plan EIR.	SU	SU ⇑	SU ⇓	SU ⇓	SU ⇔	LTS ⇓	SU ⇔

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3.12 Public Services and Recreation							
Impact PS-1: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection and emergency services.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact PS-2: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓

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Impact PS-3: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact PS-4: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for libraries.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓

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Impact PS-5: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks and community centers.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact PS-6: The proposed project would not increase the use of existing neighborhood- and regional serving parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact PS-7: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓

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Impact C-PS-1: The proposed project, combined with cumulative development in the project vicinity and citywide, would contribute to a cumulative increase in demand for fire protection and emergency services but would not result in significant environmental impacts due to the construction of new facilities.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact C-PS-2: The proposed project, combined with cumulative development in the project vicinity and citywide, would not result in an adverse cumulative increase in demand for police protection.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact C-PS-3: The proposed project, combined with cumulative development in the project vicinity and citywide, would not result in an adverse cumulative increase in demand for schools.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact C-PS-4: The proposed project, combined with cumulative development in the project vicinity and citywide, would not result in an adverse cumulative increase in demand for library services.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓

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Impact C-PS-5: The proposed project, combined with cumulative development in the project vicinity and citywide, would not result in an adverse cumulative increase in demand for parks and recreation services.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
3.13 Transportation							
Impact TR-1: The proposed project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔
Impact TR-2: The proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) regarding the use of VMT for analysis of land use projects.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact TR-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact TR-4: The proposed project would not result in inadequate emergency access.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔

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Impact TR-5: The proposed project would not cause an increase in VMT per service population over Year 2040 Cumulative No Project conditions.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔
Impact TR-6: The proposed project would not cause an increase in journey-to-work drive-alone mode share over Year 2040 Cumulative No Project conditions.	LTS	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔	LTS ⇔
Impact TR-7: The proposed project would cause a decrease in average travel speed on a transit corridor below Year 2040 Cumulative No Project conditions in the 1-hour a.m. peak period when the average speed drops below 15 mph or decreases by 25 percent or more; OR when the average speed drops by 1 mph or more for a transit corridor with average speed below 15 mph.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact C-TR-1: The proposed project would result in a cumulatively considerable contribution to a significant transportation impact.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓

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3.14 Utilities and Service Systems							
Impact UT-1: The proposed project would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact UT-2: The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact UT-3: The proposed project would not require or result in the relocation or construction of new or expanded wastewater treatment facilities, the construction or relocation of which could cause significant environmental effects.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact UT-4: The proposed project would not result in a determination by the wastewater treatment provider that serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓

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Impact UT-5: The proposed project would not require or result in the relocation or construction of new or expanded stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact UT-6: The proposed project would not require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	LTSM	LTSM ⇓	LTSM ⇓	LTSM ⇓	LTSM ⇔	LTSM ⇓	LTSM ⇓
Impact UT-7: The proposed project would not generate solid waste in excess of state or local standards or of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact UT-8: The proposed project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓

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Impact C-UT-1: The proposed project, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity, would not contribute considerably to cumulative impacts on water utility systems or water supply.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact C-UT-2: The proposed project, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity, would not contribute considerably to cumulative impacts on wastewater utility systems.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact C-UT-3: The proposed project, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity, would not contribute considerably to cumulative impacts on stormwater utility systems.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓
Impact C-UT-4: The proposed project, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity, would not contribute considerably to cumulative impacts on electric power, natural gas, or telecommunications systems.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓

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Impact C-UT-5: The proposed project, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity, would not contribute considerably to cumulative impacts related to solid waste.	LTS	LTS ⇓	LTS ⇓	LTS ⇓	LTS ⇔	LTS ⇓	LTS ⇓

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5.7 Environmentally Superior Alternative

Tables 5-2 through 5-8 contain comparisons of the impacts of the proposed project and the alternatives selected for analysis, demonstrating that each of the alternatives would have different and somewhat lesser impacts than the project, although each would continue to have significant and unavoidable impacts.

The CEQA Guidelines specify that an EIR must identify the environmentally superior alternative among those discussed. If the environmentally superior alternative is the "No Project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (CEQA Guidelines Section 15126.6(e)(2)).

In this case, the Reduced Intensity Alternative is the environmentally superior alternative because it would substantially reduce the project's significant air quality impacts (Impacts AQ-2, AQ-3, C-AQ-1, and C-AQ-2) and would substantially reduce noise impacts (Impacts NO-1b, NO-1c, C-NO-1, and C-NO-2). In addition, the Reduced Intensity Alternative would most likely reduce, and could potentially avoid, the project's significant unavoidable impacts due to demolition and substantial alteration of cultural resources (Impacts CU-1, CU-3, and C-CU-1). On the whole, due to the overall reduced scale of development, this alternative was found to provide a greater decrease in significant environmental impacts, compared to those of the proposed project, than the other alternatives considered. It should be noted, however, that to the extent that the demand for additional developed space that would otherwise be built pursuant to the proposed project would be met elsewhere in the Bay Area, employees in and residents of such development could potentially generate greater impacts on transportation systems (including vehicle miles traveled), air quality, and greenhouse gases than would be the case for development on the more compact and better-served-by-transit project site. This would be particularly likely for development in more outlying parts of the region where fewer services and less transit access is provided. While it would be speculative to attempt to quantify or specify the location where such development would occur and the subsequent impacts thereof, it is acknowledged that the Reduced Intensity Alternative would incrementally reduce local impacts in and around the project site and in Downtown San José, while potentially increasing regional emissions of criteria air pollutants and greenhouse gases, as well as regional traffic congestion. Per capita GHG emissions could also be higher under the Reduced Intensity Alternative because it would not be subject to the "no net additional" commitment of AB 900, as the proposed project is; however overall GHG emissions would be substantially lower and the impact would be less than significant due to the still relatively high density of this alternative and the availability of transit. This alternative could also incrementally increase impacts related to "greenfield" development on previously undeveloped locations in the Bay Area and, possibly, beyond.

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