

Section 4

Alternatives

4.1 INTRODUCTION

As required by CEQA, the EIR identified a number of alternatives that would decrease the level of impact from the Original Project, at the same time attaining most of the basic objectives of the Palo Alto Medical Foundation – San Carlos Center (PAMF-SCC). The EIR provided an analysis of each alternative in relation to the Original Project. For the City’s consideration in deciding whether or not to approve the Updated Project, this section provides a brief analysis of each of the identified alternatives, as well as the Original Project, in relation to the Updated Project.

4.2 DESCRIPTION OF ALTERNATIVES CONSIDERED

Table 4-1 provides a summary of key features of each alternative, the Original Project, and the Updated Project. Further details on each alternative are provided below. The previously certified EIR identified two Reduced Medical Office Building (MOB) Alternatives. In addition, the EIR identified four “No Project” Alternatives, which reflect what would be reasonably expected to occur in the foreseeable future if the PAMF-SCC were not approved and development continued to occur in accordance with existing plans and consistent with available infrastructure and community services (CEQA Guidelines, Section 15126(d)(4)).

No Project Alternative

Under the No Project Alternative, the development scenarios listed below could occur. These scenarios were identified by the City as other reasonably foreseeable uses of the Project Site, in part based upon inquiries about such uses received by the City and an overview of market conditions.¹ The description of the alternatives below is abstracted from the previously certified EIR.

No Project Alternative A: Continuation of Existing Site Use

Under No Project Alternative A, the four main buildings, wastewater treatment plant, hazardous waste storage area, and other smaller structures at the Project Site would be closed, decommissioned, and abandoned by CPI. Site development would occur as refurbishing and reoccupation of the existing industrial buildings that are one to two stories tall, containing approximately 330,000 square feet of floor space, and covering approximately 42 percent of the parcel. The site would remain operable for industrial use by an operator other than CPI and under its current Light Industrial (M-1) zoning designation. Using the employment density factors identified in the previously certified EIR, this alternative would house 825 employees.

¹ KMA, Draft Report for the Palo Alto Medical Foundation Site – Evaluation of Alternatives Market Potential, December, 2005.

**Table 4-1
Comparative Description of Project Alternatives**

Alternative	Description	Use	Estimated Employees	Estimated Developed Floor Area^a (square feet)	Change in Employees from Updated Project	Change in Floor Area (square feet) from Updated Project
No Project Alternative						
B	Replace existing buildings with business park	Industrial	640	320,000	-325	-95,100
C	Replace existing buildings with retail uses	Commercial	370	185,000	-595	-230,100
D	Replace existing buildings with auto mall	Commercial	200	90,000	-765	-325,100
Reduced MOB 1	Reduced number of physicians to reduce size of MOB	Hospital and Medical Office	942 ^b	388,000	-23	-27,100
Reduced MOB 2	Fewer number of physicians than Updated Project, but greater than Reduced MOB 1	Hospital and Medical Office	1,176	442,500	211	27,400
Original Project	141,600-square-foot hospital; 193,200-square-foot MOB; 131,200 square feet of ACC and hospital support space; 180 physicians and 1,140 support staff	Hospital and Medical Office	1,320	466,000	355	50,900
Updated Project	190,877-square-foot hospital; 120,624-square-foot MOB; 103,600 square feet of ACC and hospital support space; 120 physicians and 845 support staff	Hospital and Medical Office	965	415,100	-	-

Source: EIP Associates, 2007.

Notes:

- a. For the purposes of this table, developed floor area for the medical alternatives excludes floor area associated with the Central Plant and garages.
- c. This number corrects the 792 employee estimate in the previously certified EIR.

However, as stated in Section 2 of this document, demolition of the CPI facilities has commenced pursuant to a Demolition Permit issued on June 12, 2007. As such, implementation of No Project Alternative A (Continuation of Existing Use) in the precise manner as described in the EIR would be precluded, and no further analysis of this alternative is provided in this document. Importantly, however, approval of the Demolition Permit would not preclude industrial re-use of the Project Site consistent with the site's zoning and No Project Alternative B (Redevelopment for Industrial Use), as described in more detail below.

No Project Alternative B: Redevelopment for Industrial Use

Under No Project Alternative B, the existing structures would be demolished and replaced with a new 320,000-square-foot industrial building complex, representing an FAR of 0.4. The site would be redeveloped for research and development uses as a business park, perhaps in a campus setting, marked by an integrated site plan, consistent landscaping, and an architectural design that unifies the various buildings. Buildings would likely vary between one and three stories. Under the current zoning regulations for the M-1 district, allowable development at the site would include:

- Maximum building height of 75 feet, and
- Minimum landscaping of 10 percent of the 18.1-acre parcel.

This alternative would house approximately 640 employees. No Project Alternative B would be consistent with the site's existing Planned Industrial land use designation and conform to existing FAR regulations.

No Project Alternative C: Redevelopment for Regional Retail Use

Under No Project Alternative C, the existing structures would be demolished and replaced with 185,000 square feet of regional retail uses, at a FAR of 0.23, which is commonplace for regional retail facilities. For purposes of this alternative, regional retail use at the Project Site is assumed to consist of a big box retail use as the anchor, with an additional 35,000 to 75,000 square feet of smaller retail uses in a shopping center configuration. Redevelopment of the Project Site for regional retail uses would require a General Plan amendment. Because regional retail use is not permitted under the current M-1 zoning district, the site would also need to be rezoned Planned Community (P-C). No Project Alternative C would result in about 370 retail-related jobs.

It should be noted that when the Harbor Industrial Area, including the Project Site, annexed to the City in 1997, there was an agreement between the City and San Mateo County that property tax revenues from any new retail development greater than 25,000 square feet in floor area would belong to the County until 2013. Thus, No Project Alternative C would not provide a property tax revenue stream to the City until 2013.

No Project Alternative D: Redevelopment for Automobile Dealership Use

Under No Project Alternative D, the existing industrial structures would be demolished and replaced with an automobile “mall,” containing three automobile dealerships. While the majority of the site would remain as paved areas to show the automobiles, there would be a total of 90,000 square feet of floor space for sales offices, showrooms, and maintenance/repair facilities (an FAR of 0.11). This alternative use for the Project Site would be permitted under the existing General Plan and zoning designations. Based on the ABAG multipliers for the retail trade industry sector, this alternative would generate 200 employees. However, as with No Project Alternative C, the City would not receive property tax revenues until 2013 for this alternative under the terms of the annexation agreement.

Reduced Medical Office Building Alternative 1

Under the Reduced Medical Office Building (MOB) Alternative 1, physicians who do not need a direct physical connection to the proposed Inpatient Hospital are assumed to locate elsewhere. The physicians who do not need a direct hospital connection include those offering family practice, internal medicine, and pediatrics; allergy and dermatology; ophthalmology and optometry; physiatry (physical sports/medicine); and psychiatry. There would be on-site 942 physicians and staff associated with this alternative. It should be noted that the EIR identifies 792 employees under this alternative, and this Addendum corrects the EIR through this discussion. The MOB floor space under this alternative would be 102,686 square feet (a reduction of 90,500 from that of the Original Project), and the total floor area would be 388,000 square feet.² The parking supply under this alternative would be 1,377 spaces.

The intent of Reduced MOB Alternative 1 would be to configure the MOB, the Ambulatory Care Clinic/Hospital Support, and the Inpatient Hospital to remain as functionally efficient as possible and to maintain the desired functional adjacencies among related departments and services.

Reduced Medical Office Building Alternative 2

Reduced MOB Alternative 2, developed by PAMF (see Appendix H of the previously certified EIR), is a variation of Reduced MOB Alternative 1 that was intended to reduce the Original Project’s significant impacts related to traffic and air quality, as discussed above. The MOB floor space under this alternative would be 157,000 square feet (a reduction of 36,000 from that of the Original Project), and the total floor area would be 442,500 square feet. With this alternative, there would be approximately 1,176 staff and physicians located at the Project Site. The parking supply under this alternative would be 1,233 spaces.

As with Reduced MOB Alternative 1, Reduced MOB Alternative 2 would be configured so that the MOB, the Ambulatory Care Clinic/Hospital Support, and the Hospital would function as efficiently as possible.

² Cronin, John, Cronin & Associates, correspondence with the City of San Carlos, May 13, 2005.

4.3 IMPACT ASSESSMENT

Comparative Analysis

This section evaluates whether the alternatives would reduce potentially significant impacts of the Updated Project and/or would generate impacts other than those identified for the Updated Project. A summary comparative analysis is provided in Table 4-2, below. As indicated in Table 4-2, the Updated Project would have reduced traffic impacts in comparison to Reduced MOB Alternatives 1 and 2. Significant and unavoidable project-related air quality impacts that would occur under Reduced MOB Alternative 2 would be avoided under the Updated Project and Reduced MOB Alternative 1. The indirect housing demand associated with the Updated Project would also be less than that of Reduced MOB Alternatives 1 and 2. However, No Project Alternative D, involving and automobile dealership use would result in the least environmental impact, as this alternative results in the least trip generation, air emissions, and housing and utility demand among all alternatives.

Environmentally Superior Alternative

Sections 21002 and 21081 of CEQA require lead agencies to adopt feasible mitigation measures or feasible environmentally superior alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. Where the environmentally superior alternative also is the no project alternative, CEQA Guidelines Section 15126(d)(4) requires the EIR to identify an environmentally superior alternative from among the other alternatives.

No Project Alternative D, involving an automobile dealership, would be the environmentally superior alternative because this alternative would avoid significant and unavoidable construction vibration impacts from the Updated Project and would not have freeway impacts at the project level, thus avoiding a transportation-related significant and unavoidable impact.

CEQA also requires the selection of another alternative other than the No Project Alternative as the environmentally superior alternative (see CEQA Guidelines, Section 15126.6(e)(2)). Reduced MOB Alternative 1 had been identified in the previously certified EIR as the environmentally superior, because it would avoid the significant and unavoidable operational air quality impact of Reduced MOB Alternative 2. Based on Table 4-2, the Updated Project and Reduced MOB Alternative 1 would generally have similar levels of impact, and both would have less impacts than Reduced MOB Alternative 2. However, the Updated Project would result in less environmental impacts than Reduced MOB Alternative 1, because it would significantly affect one less freeway segment than Reduced MOB Alternative 1. Therefore, between the Updated Project and Reduced MOB Alternative 1, the Updated Project would be environmentally superior.

**Table 4-2
Assessment of Project Alternatives (compared to the Updated Project)**

Environmental Factor	Updated Project	Original Project	No Project Alternative B: Redevelopment for Industrial Use	No Project Alternative C: Redevelopment for Regional Retail Use	No Project Alternative D: Redevelopment for Automobile Dealership Use	Reduced Medical Office Building Alternative 1	Reduced Medical Office Building Alternative 2
Land Use	significant but mitigable conflict with Noise Policy 1, Open Space & Conservation Policy 6, Circulation Policy 9; potentially significant conflicts with Circulation Policy 4 under Cumulative Conditions	O similar noise, circulation, and conservation policy conflicts	+ avoids significant but mitigable noise and conservation policy conflicts, but potentially significant conflicts with Circulation Policy 4 under Cumulative Conditions similar to Updated Project; significant but mitigable conflict with Transportation Policy 9 similar to Update Project	O avoids significant but mitigable noise and conservation policy conflicts, but potentially significant conflicts with Circulation Policy 4 under Cumulative Conditions similar to Updated Project; conflicts with Transportation Policy 9, unlike the Updated Project	O avoids significant but mitigable noise and conservation policy conflicts; but potentially significant conflicts with Circulation Policy 4 under Cumulative Conditions, similar to Updated Project; conflicts with Transportation Policy 9, unlike the Updated Project	O similar noise, circulation, and conservation policy conflicts to Updated Project	O similar noise, circulation, and conservation policy conflicts to Updated Project
Visual Quality	less-than-significant impacts	O similar-less-than-significant visual impacts to Updated Project	O similar less-than-significant visual impacts to Updated Project	O similar less-than-significant visual impacts to Updated Project	O similar less-than-significant visual impacts to Updated Project	O similar less-than-significant visual impacts and site improvements to Updated Project	O similar less-than-significant visual impacts and site improvements to Updated Project

Key:	++ substantially better than Updated Project; much less impacts	O same as the Updated Project; comparable impacts
	+ better than Updated Project; less impact	— worse than Updated Project; more impacts

Table 4-2 (continued)
Assessment of Project Alternatives (compared to the Updated Project)

Environmental Factor	Updated Project	Original Project	No Project Alternative B: Redevelopment for Industrial Use	No Project Alternative C: Redevelopment for Regional Retail Use	No Project Alternative D: Redevelopment for Automobile Dealership Use	Reduced Medical Office Building Alternative 1	Reduced Medical Office Building Alternative 2
Transportation	723 PM peak hour trips; significant and unavoidable impacts on two freeway segments and two intersections	— 1,021 PM peak hour trips (298 more than Updated Project); significant and unavoidable impact at three freeway segments (one more than the Updated Project); significant and unavoidable impact at four intersections (two more than Updated Project)	+ 174 PM peak hour trips (549 less than Updated Project); avoids the significant unavoidable cumulative freeway impacts of the Updated Project; significant and unavoidable impacts at two intersections, as with Updated Project	— 877 PM peak hour trips (154 more than Updated Project); significant and unavoidable impact at three freeway segments (one more than the Updated Project); significant and unavoidable impacts at two intersections, as with Updated Project	+ 121 PM peak hour trips (602 less than Updated Project); avoids the significant unavoidable cumulative freeway impacts of the Updated Project; significant and unavoidable impacts at two intersections, as with Updated Project	— 774 PM peak hour trips (51 more than Updated Project); significant and unavoidable impact at three freeway segments (one more than the Updated Project); significant and unavoidable impacts at two intersections, as with Updated Project	— 986 PM peak hour trips (263 more than Updated Project); significant and unavoidable impact at three freeway segments (one more than the Updated Project); significant and unavoidable impacts at two intersections, as with Updated Project
Air Quality	potentially significant but mitigable construction emissions; significant but mitigable project operational emissions;	— similar potentially significant but mitigable construction emissions; significant and unavoidable project and cumulative operational	+ similar potentially significant but mitigable construction emissions; less-than significant project and cumulative operational impacts	+ similar potentially significant but mitigable construction emissions; less-than significant project and cumulative operational impacts	+ similar potentially significant but mitigable construction emissions; less-than significant project and cumulative operational impacts	O similar potentially significant but mitigable construction emissions; significant but mitigable project operational emissions as with	— similar potentially significant but mitigable construction emissions; significant and unavoidable project and cumulative operational

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Table 4-2 (continued)
Assessment of Project Alternatives (compared to the Updated Project)

Environmental Factor	Updated Project	Original Project	No Project Alternative B: Redevelopment for Industrial Use	No Project Alternative C: Redevelopment for Regional Retail Use	No Project Alternative D: Redevelopment for Automobile Dealership Use	Reduced Medical Office Building Alternative 1	Reduced Medical Office Building Alternative 2
	significant and unavoidable cumulative operational impacts; less-than-significant TAC exposure	emissions; less-than-significant impacts related to TAC exposure				Updated Project; significant and unavoidable cumulative operational impacts; less-than-significant impacts related to TAC exposure	emissions; less-than-significant impacts related to TAC exposure
Noise	less-than-significant construction noise; significant and unavoidable vibration from pile driving; potentially significant but mitigable impacts from exterior noise intrusion	O similar noise impacts as Updated Project	+ avoids potentially significant but mitigable exposure of hospital occupants to freeway noise, similar construction-related noise impacts to Updated Project	+ avoids potentially significant but mitigable exposure of hospital occupants to freeway noise, similar construction-related noise impacts to Updated Project	++ avoids potentially significant but mitigable exposure of hospital occupants to freeway noise, avoids significant and unavoidable vibration impacts from Updated Project	O similar noise impacts to Updated Project	O similar noise impacts to Updated Project

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Table 4-2 (continued)
Assessment of Project Alternatives (compared to the Updated Project)

Environmental Factor	Updated Project	Original Project	No Project Alternative B: Redevelopment for Industrial Use	No Project Alternative C: Redevelopment for Regional Retail Use	No Project Alternative D: Redevelopment for Automobile Dealership Use	Reduced Medical Office Building Alternative 1	Reduced Medical Office Building Alternative 2
Cultural Resources	potentially significant but mitigable impacts on archeological and paleontological resources, or human remains	O similar cultural resource impacts to Updated Project	O similar cultural resource impacts to Updated Project	O similar cultural resource impacts to Updated Project	O similar cultural resource impacts to Updated Project	O similar cultural resource impacts to Updated Project	O similar cultural resource impacts to Updated Project
Biological Resources	potentially significant but mitigable impacts on sensitive species habitat and nesting birds	O similar biological resource impacts to Updated Project	O similar biological resource impacts to Updated Project	O similar biological resource impacts to Updated Project	O similar biological resource impacts to Updated Project	O similar biological resource impacts to Updated Project	O similar biological resource impacts to Updated Project
Geology, Soils, and Seismicity	less-than-significant impacts related to geology, soils, and seismicity	O similar geoseismic impacts to Updated Project	O similar geoseismic impacts to Updated Project	O similar geoseismic impacts to Updated Project	O similar geoseismic impacts to Updated Project	O similar geoseismic impacts to Updated Project	O similar geoseismic impacts to Updated Project

Key:	++ substantially better than Updated Project; much less impacts	O same as the Updated Project; comparable impacts
	+ better than Updated Project; less impact	— worse than Updated Project; more impacts

Table 4-2 (continued)
Assessment of Project Alternatives (compared to the Updated Project)

Environmental Factor	Updated Project	Original Project	No Project Alternative B: Redevelopment for Industrial Use	No Project Alternative C: Redevelopment for Regional Retail Use	No Project Alternative D: Redevelopment for Automobile Dealership Use	Reduced Medical Office Building Alternative 1	Reduced Medical Office Building Alternative 2
Hydrology and Water Quality	less-than-significant impacts on hydrology and water quality	O similar water resource impacts to Updated Project	O more impervious surface but similar water resource impacts to Updated Project	O more impervious surface but similar water resource impacts to Updated Project	O more impervious surface but similar water resource impacts to Updated Project	O similar water resource impacts to Updated Project	O similar water resource impacts to Updated Project
Hazardous Materials	less-than-significant impacts related to construction and operational handling and transport of hazardous materials	O similar less-than-significant impacts to Updated Project	O similar less-than-significant impacts to Updated Project; less site clean up than Updated, Project since remediation pursuant to RAP	O similar less-than-significant impacts to Updated Project; less site clean up than Updated, Project since remediation pursuant to RAP	O similar less-than-significant impacts to Updated Project; less site clean up than Updated, Project since remediation pursuant to RAP	O similar less-than-significant impacts to Updated Project	O similar less-than-significant impacts to Updated Project
Population and Housing	965 on-site employees; less-than-significant direct and indirect impacts on housing demand	— 1,320 on-site employees; less-than-significant but increased direct and indirect impacts on housing demand	O 640 on-site employees; less-than-significant but decreased direct and indirect impacts on housing demand	O 370 on-site employees; less-than-significant but substantially decreased direct and indirect impacts on housing demand	+ 200 on-site employees; less-than-significant but substantially decreased direct and indirect impacts on housing demand	O 942 on-site employees; similar less-than-significant direct and indirect impacts on housing demand	O 1,176 on-site employees; less-than-significant but increased direct and indirect impacts on housing demand

Key:	++ substantially better than Updated Project; much less impacts	O same as the Updated Project; comparable impacts
	+ better than Updated Project; less impact	— worse than Updated Project; more impacts

Table 4-2 (continued)
Assessment of Project Alternatives (compared to the Updated Project)

Environmental Factor	Updated Project	Original Project	No Project Alternative B: Redevelopment for Industrial Use	No Project Alternative C: Redevelopment for Regional Retail Use	No Project Alternative D: Redevelopment for Automobile Dealership Use	Reduced Medical Office Building Alternative 1	Reduced Medical Office Building Alternative 2
Public Services	less-than-significant impacts on public services	O less-than-significant but increased impacts on public services	O less-than-significant but decreased impacts on public services	O less-than-significant but decreased impacts on public services	O less-than-significant but decreased impacts on public services	O similar less-than-significant impacts on public services	O less-than-significant but increased impacts on public services
Utilities	less-than-significant impacts on utility demand	O less-than-significant but increased impacts on utility demand	O less-than-significant but decreased impacts on utility demand	O less-than-significant but decreased impacts on utility demand	+ less-than-significant but substantially decreased impacts on utility demand	O similar less-than-significant impacts on utility demand	O less-than-significant but increased impacts on utility demand

Key:	++ substantially better than Updated Project; much less impacts	O same as the Updated Project; comparable impacts
	+ better than Updated Project; less impact	— worse than Updated Project; more impacts