

CHAPTER 1

Introduction

1.1 Purpose of This Environmental Impact Report

The City of San José (City), as the lead agency, has prepared this draft environmental impact report (EIR) for the Downtown West Mixed-Use Plan (proposed project) in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines, and San José Municipal Code Title 21. This EIR evaluates the whole of the proposed project, including project-level impacts (off-site, on-site, construction-related, operational, direct, and indirect) and cumulative impacts.

As described in CEQA Guidelines Section 15121(a), an EIR is an informational document that assesses the potential environmental impacts of a proposed project, and identifies mitigation measures and alternatives to the project that could reduce or avoid adverse environmental impacts. As the CEQA lead agency for this project, the City is required to consider the information in the EIR along with any other available information in deciding whether to approve the project.

The basic requirements for an EIR include discussions of the environmental setting, environmental impacts, mitigation measures, cumulative impacts, alternatives, and growth-inducing impacts. It is not the intent of an EIR to recommend either approval or denial of a project.

This EIR was prepared as an informational document that in and of itself does not determine whether the proposed project or any component of it, such as proposed street network changes, will be approved. The EIR informs the planning and decision-making process by disclosing the potential for significant adverse impacts. In conformance with CEQA (California Public Resources Code Section 21000 et seq.), this EIR provides objective information addressing the environmental consequences of the proposed project and identifies the means of reducing or avoiding its significant impacts where feasible. The CEQA Guidelines help define the role and expectations of this EIR as follows:

- **Informational Document.** An EIR is an informational document that informs public agency decision-makers and the public of the significant environmental effect(s) of a project, identifies feasible ways to avoid or minimize significant effects, and describes reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information contained in the administrative record (Section 15121(a)).
- **Degree of Specificity.** An EIR on a construction project necessarily will be more detailed in the specific effects of the project than an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction project can be

predicted with greater accuracy. An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be reasonably expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow (Section 15146).

- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (Section 15151).
- **Type of EIR.** An EIR can be tailored to different situations and intended uses, but all EIRs must meet the content requirements of Section 15120. This document is a project-level EIR. A project-level EIR focuses primarily on the changes in the environment that would result from all phases of the project including planning, construction, and operation of the specific development project (Section 15161).

1.2 Environmental Review Process

1.2.1 Notice of Preparation and Scoping

In accordance with CEQA Guidelines Sections 15063 and 15082, the City prepared a notice of preparation (NOP) for this EIR. The NOP provided a general description of the proposed project and identified environmental impacts that could result from its implementation. The NOP was circulated to federal, state, and local agencies and other interested parties on October 23, 2019. The standard 30-day comment period concluded on November 22, 2019.

The City held a public scoping meeting on November 7, 2019, to discuss the proposed project and solicit public input on the scope and contents of this EIR. The meeting was held at the San José City Hall, Wing Rooms 118–120, at 200 East Santa Clara Street, San José, CA 95113.

The Department of Planning, Building, and Code Enforcement has considered the comments made by the public and agencies in response to the NOP, as summarized in **Table 1-1**. Comments on the NOP that relate to environmental issues are addressed and analyzed throughout this EIR. The scoping comments, as summarized in this table, also indicate areas of controversy known to the lead agency and issues to be resolved, per CEQA Guidelines Section 15123. **Appendix A1** of this EIR includes the NOP and comments received on the NOP. While no formal written response to comments on the NOP is required by CEQA, comments relevant to environmental issues are reflected in the topical sections/analyses in the EIR.

**TABLE 1-1
SUMMARY OF SCOPING COMMENTS**

Topic	Comment
CEQA Process	<ul style="list-style-type: none"> The EIR would be better suited as a program-level document, rather than a project-specific document. The EIR review process should be extended. The EIR should discuss the scope of direct or indirect impacts.
Scoping	<ul style="list-style-type: none"> The scoping meeting was not well advertised and did not reach all areas that would be affected by the proposed project. The scoping period was only 15 days when it typically lasts 60–90 days. The public should be able to review the final project description before circulation of the final EIR.
Project Description	<ul style="list-style-type: none"> The project description should be consistent with the Assembly Bill (AB) 900 application. Include discussions of tiering off of other planning documents. Describe the baseline year used for impact analysis; the timeline/phasing of the project; how transit providers' station access requirements would be accommodated; project objectives; the number of employees and other on-site users; consistency with other plans in the area; and permit requirements. Include details about planned development such as improvements to roadways (including bike lanes), bridges, parking, open space and trails, utilities, and preservation of Diridon Station.
Air Quality	<ul style="list-style-type: none"> The project may have a significant impact on air quality due to increased traffic. The EIR should use Bay Area Air Quality Management District (BAAQMD) Guidelines. The EIR should identify all required permits from the air district. The EIR should evaluate consistency with other air quality plans and human health risk.
Biological Resources	<ul style="list-style-type: none"> The EIR should describe the baseline conditions of the aquatic and riparian ecosystems as well as anticipated work affecting these systems. The EIR should evaluate impacts on biological resources. Include mitigation measures for impacts on Los Gatos Creek. Mitigation should comply with the City's policies and guidelines. New plantings should be native, non-invasive species.
Tribal Cultural Resources	<ul style="list-style-type: none"> Include compliance with AB 52 and Senate Bill (SB) 18 tribal consultation requirements. Evaluate buildings on the project site for cultural resource status and analyze impacts on these resources. Evaluate the impact of the project on historic and other nearby neighborhoods, including the Delmas area.
Greenhouse Gas (GHG) Emissions	<ul style="list-style-type: none"> The lead agency should use the BAAQMD Guidelines and tools to analyze GHG impacts from the project. The EIR should discuss impacts of tree removal on carbon absorption capacity, project emissions, and energy use during construction and operation. The EIR should include mitigation measures.
Hazards and Hazardous Materials	<ul style="list-style-type: none"> Consider alternative evacuation routes from the project site. Evaluate homes on West San Carlos Street for hazardous materials. The EIR should include a discussion of potential hazardous materials associated with the homeless community within the project site, cleanup/remediation measures, and mitigation measures to reduce the impact of hazardous materials.

**TABLE 1-1
 SUMMARY OF SCOPING COMMENTS**

Topic	Comment
Hydrology and Water Quality	<ul style="list-style-type: none"> • The EIR should discuss: <ul style="list-style-type: none"> - Baseline hydrologic conditions and impacts on underground parking feasibility - Adequacy of current water supply sources - Estimate of water that will be pumped from underground structures at buildout - Any new or improvements to existing outfalls as part of the proposed project - Impacts on existing wells and planned destruction/construction of wells - Impacts on sewer systems and waterways • The EIR should include a water supply assessment (WSA).
Land Use and Land Use Planning	<ul style="list-style-type: none"> • The EIR should include: <ul style="list-style-type: none"> - Analysis of a range of residential and other non-office uses - Analysis of project impacts on the assumptions made in planning documents - Discussion of how the project will affect past City approvals
Aesthetics	<ul style="list-style-type: none"> • Evaluate impacts on aesthetics and shade in regards to the nearby trails. • Evaluate impact of glare from project buildings. • Evaluate compliance with standards in the City's Design Guidelines. • Implement mitigation measures for light pollution.
Noise	<ul style="list-style-type: none"> • The EIR should evaluate noise generated from groundwater pumping activities and construction noise. • Implement all mitigation measures to limit noise impacts on nearby residents.
Population and Housing	<ul style="list-style-type: none"> • The EIR should evaluate: <ul style="list-style-type: none"> - Impacts on housing availability and displacement - Impact on the homeless population within and near the project site • The EIR should include a Job/Housing Fit analysis and mitigation measures to reduce and/or eliminate displacement.
Environmental Justice	<ul style="list-style-type: none"> • The EIR should evaluate: <ul style="list-style-type: none"> - Impacts on communities of color including school enrollment and the housing market - Impacts on vulnerable communities and businesses that serve vulnerable communities - The benefits that will be afforded to communities historically excluded from economic activities
Public Services	<ul style="list-style-type: none"> • Mitigate impacts on public services. • The EIR should evaluate impacts on emergency service levels, response times, access to the project site and nearby development, and evacuation routes from the northernmost area of the project.
Recreation	<ul style="list-style-type: none"> • Describe baseline conditions, including safety at Los Gatos Creek. • Evaluate project compliance with other park plans and impacts on recreation in regards to nearby trails and parks. • Identify mitigation measures.

**TABLE 1-1
 SUMMARY OF SCOPING COMMENTS**

Topic	Comment
Transportation and Circulation	<ul style="list-style-type: none"> • The EIR should include a Transportation Demand Management (TDM) Plan, Transportation Analysis (TA), and a Local Transportation Analysis (LTA). • The EIR should use both level of service (LOS) and vehicle miles traveled (VMT) methodologies for analysis and should provide assumptions and performance measures. • The EIR should evaluate impacts on transportation, parking, and circulation for all modes of transport. • Mitigation measures should mitigate adverse parking effects on nearby residents/businesses and include implementation responsibilities for mitigation of impacts.
Utilities and Service Systems	<ul style="list-style-type: none"> • The EIR should evaluate and identify: <ul style="list-style-type: none"> - Consistency with Pacific Gas and Electric Company (PG&E) requirements - Utilities within California Department of Transportation (Caltrans) right-of-way and permit requirements - Increased project-related demand for utilities and capacity of the PG&E substation - Planned utility maintenance services - Potential mitigation measures
Cumulative Impacts	<ul style="list-style-type: none"> • The EIR should evaluate cumulative impacts and incorporate past, present, and future projects.
Alternatives	<ul style="list-style-type: none"> • The EIR should include alternatives that account for the following: <ul style="list-style-type: none"> - The roadway configuration in the NOP - The City's plans for Santa Clara Street as a transit priority corridor - A scaled-down campus size - A campus at an alternative location - A No Project Alternative • The alternatives section should clearly describe and differentiate between the "Proposed Project" and the "Northern Variant."
Mitigation Monitoring and Reporting	<ul style="list-style-type: none"> • Publish monitoring reports for impacts on air, hydrology and water quality, and biological resources online, both during construction and 25 years after construction, for public review.

1.2.2 Project Changes after the Notice of Preparation

The project applicant, Google LLC, originally planned for an approximately 84-acre project site in the project application, and the NOP described the same acreage. Since publication of the NOP, the project boundary has been reduced by 3 acres because the applicant is no longer proposing to include parcels along Cahill Street adjacent to Diridon Station that are owned by the Peninsula Corridor Joint Powers Board (Caltrain). The applicant originally included these parcels, with Caltrain's consent, because the parties were in discussions about Google acquiring these parcels for inclusion in the Downtown West Mixed-Use Plan. The parties have not reached terms on a real estate transaction and have mutually agreed that the parcels should be removed from the project boundary (refer to **Appendix A2**). Development of those parcels would instead likely be planned as part of the City's broader Diridon Station Area Plan (DSAP) amendment, which is included as a cumulative project in this EIR. Further, Caltrain is a participating agency in the Diridon Integrated Station Concept process, and development of these parcels—which interface

directly with Diridon Station—may be affected by future plans for the upgraded station. Although removal of the Caltrain parcels reduces the project site by 3 acres, this is a small area when compared to the total project site, and the full development program would continue to be accommodated on the reduced project area of 81 acres.

Overall, the development parcels other than the Caltrain parcels remain generally consistent with those in the NOP project, as does the proposed street network within the project site. At the time of the NOP, the Caltrain parcels were assumed to be developed with office space, and under the project analyzed in this EIR, the development program has been redistributed. Much of the office space assumed for the Caltrain parcels would now be developed north of West Santa Clara Street, replacing some of the residential development previously proposed there. Those residential units, and some of the Caltrain parcels office space, have been redistributed across the remainder of the project site. All of these changes are reflected in the analysis in this EIR.

Additionally, the NOP project proposed approximately 16.8 acres of open space, while the project analyzed in this EIR proposes about 15 acres of open space. The reduction is due to elimination of one open space area that would have been located on the Caltrain parcels and to refinement of open space typologies (i.e., semi-public vs. riparian vs. open space, etc.), as well as minor adjustments to block boundaries and private streets, as compared to the plan contemplated at the time of the NOP.

The project analyzed in the EIR also includes more parking spaces than described in the NOP. In response to comments on the NOP expressing the opinion that the proposed parking supply would be insufficient, the project applicant now proposes up to 7,160 total parking spaces, 39 percent more parking than the 5,160 spaces proposed in the NOP.

Finally, the NOP project included a “Northern Variant” under which the locations of some project land uses would be different north of West Santa Clara Street, although the overall development program would be the same. The Northern Variant is no longer under consideration and is, therefore, not analyzed in this EIR. Also since the NOP, the square footage proposed for district utilities buildings floor area has increased by 13 percent, from 115,000 gross square feet (gsf) to 130,000 gsf.

The above-described changes generally correspond to differences between the project analyzed in the project’s application for certification under Assembly Bill 900 (AB 900; discussed in Section 1.3, *Assembly Bill 900*) and the project analyzed in this EIR, with the following exceptions:

- The AB 900 project (Variant A) anticipated 100,000 gsf of district utilities, compared to 115,000 gsf in the NOP project and 130,000 gsf analyzed in this EIR.
- The AB 900 project (Variant A) proposed 6,010 parking spaces, compared to a maximum of 5,160 parking spaces in the NOP and 6,560 parking spaces for the project analyzed in this EIR.
- The phasing of construction and occupancy of the project analyzed in this EIR varies somewhat from the development phasing assumed in the AB 900 project. (No specific phasing program was identified in the NOP.)

All of the above-changes in the project description since publication of the NOP are reflected in the analyses in Chapter 3 of this EIR.

1.2.3 Draft Environmental Impact Report Public Review and Comment Period

CEQA Guidelines Section 15201 encourages public participation in the planning and environmental review processes. The public is invited to provide comments and concerns regarding the environmental issues that are addressed and analyzed throughout this EIR.

Publication of this draft EIR establishes the 45-day public review and comment period, which begins on Wednesday October 7, 2020, and ends on Monday November 23, 2020.¹ During this period, the draft EIR will be available to federal, state, and local agencies and interested organizations and individuals for review. Notice of this draft EIR will be sent directly to every agency, person, and organization that commented on the NOP.

A limited number of printed copies of this draft EIR is available. Should you wish to receive a printed copy (excluding appendices, which will be on electronic media only), please email:

shannon.hill@sanjoseca.gov

During the 45-day public review and comment period, written comments regarding the environmental review contained in this draft EIR should be sent to:

City of San José, Department of Planning, Building, and Code Enforcement
Attn: Shannon Hill, Environmental Project Manager
200 East Santa Clara Street, 3rd Floor Tower
San José, CA 95113

Alternatively, commenters may submit written comments by email to the environmental project manager at the following address:

shannon.hill@sanjoseca.gov

1.3 Assembly Bill 900

The project applicant filed an application with the Governor's Office of Planning and Research in summer 2019, and the application was subject to public review from September 3, 2019, through October 3, 2019.² On December 30, 2019, Governor Gavin Newsom certified the project under the Jobs and Economic Improvement through Environmental Leadership Act of 2011 (AB 900, as amended by Senate Bill 734 and AB 246). AB 900, as amended, provides judicial streamlining

¹ Two days have been added to the public review period so that it does not end on a weekend.

² Governor's Office of Planning and Research, *California Jobs (AB 900): Submitted Applications, 2019080493, Downtown West Mixed-Use Project*. Available at <http://opr.ca.gov/ceqa/california-jobs.html>. Accessed November 2, 2019.

benefits under CEQA for certified environmental leadership development projects and defines an environmental leadership development project as the following:³

- The project is residential, retail, commercial, sports, cultural, entertainment, or recreational in nature;
- The project, upon completion, will qualify for Leadership in Energy and Environmental Design (LEED) Gold certification or better;
- The project will achieve at least 15 percent greater transportation efficiency than comparable projects;⁴
- The project is located on an infill site⁵ and in an urbanized area;
- In the Bay Area, the project is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in *Plan Bay Area 2040*, the region’s sustainable communities strategy;⁶ and
- Private vehicle parking spaces for multifamily residential projects are priced and rented or purchased separately from dwelling units; or dwelling units are subject to affordability restrictions that prescribe rent or sale prices, and the cost of parking spaces cannot be unbundled from the cost of dwelling units.⁷

For the Governor to certify an environmental leadership development project, the project (or project applicant) must: (1) result in a minimum investment of \$100 million in California upon completion of construction; (2) create high-wage, highly skilled jobs that pay prevailing wages and living wages and provide construction jobs and permanent jobs for Californians, and help reduce unemployment; (3) not result in any net additional greenhouse gas (GHG) emissions; (4) comply with state requirements for commercial and organic waste recycling; (5) have a binding agreement with the lead agency committing to implement and monitor mitigation measures required to comply with AB 900, as amended; and (6) agree to pay appellate court costs if applicable and the cost of preparing the administrative record of proceedings.⁸

On December 19, 2019, the California Air Resources Board determined that the proposed project would not result in any net additional GHG emissions for purposes of certification under AB 900, as amended,⁹ leading to the Governor’s review and certification on December 30, 2019.

³ California Public Resources Code Section 21178 et seq. and Governor’s Office of Planning and Research, *California Jobs (AB 900): Governor’s Guidelines for Streamlining Judicial Review Under the California Environmental Quality Act Pursuant to AB 900*. Available at <http://opr.ca.gov/ceqa/california-jobs.html>. Accessed November 2, 2019.

⁴ “Transportation efficiency” is defined as the number of vehicle trips by employees, visitors, or customers to the project divided by the total number of employees, visitors, and customers. The applicant shall provide information setting forth its basis for determining and evaluating comparable projects and their transportation efficiency, and how the project will achieve at least 15 percent greater transportation efficiency. For the purpose of this provision, comparable means a project of the same size, capacity, and location.

⁵ An infill site is defined in Public Resources Code Section 21061.3 as a site that “has been previously developed for qualified urban uses.” A “qualified urban use” is defined in Public Resources Code Section 21072 as “any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses.”

⁶ California Public Resources Code Section 21180(b).

⁷ California Public Resources Code Section 21184(a), added by SB 734 (2016).

⁸ California Public Resources Code Section 21183.

⁹ California Air Resources Board, *Executive Order G-19-154 Relating to Determination of No Net Additional Greenhouse Gas Emissions Under Public Resources Code Section 21183(c) for Downtown West Mixed-Use Plan*, December 19, 2019.

Within 10 days after the Governor certified the proposed project as an environmental leadership development project, the Department of Planning, Building, and Code Enforcement issued a public notice stating that the applicant has elected to proceed under Chapter 6.5 (commencing with Section 21178) of the Public Resources Code. This chapter provides, among other things, that any judicial action challenging the certification of the EIR or the approval of the project described in the EIR is subject to the procedures set forth in Sections 21185–21186, inclusive, of the Public Resources Code. The notice was issued on January 8, 2020, by direct mailing to organizations and individuals who had previously requested notices and by publication in the *San Jose Mercury News*. A second notice was issued on February 5, 2020, by direct mailing to organizations and individuals who had previously requested notices and by posting of notices on and around the project site notifying the public of the Joint Budget Legislative Committee's concurrence pursuant to Public Resources Code Section 21184(b)(2).

In accordance with AB 900, as amended (Public Resources Code Section 21186), the Department of Planning, Building, and Code Enforcement, as the local lead agency under CEQA, has made this EIR available to the public on the City's website and has prepared a record of proceedings for the proposed project that can be accessed and downloaded from the following website: <https://www.sanjoseca.gov/your-government/departments-offices/planning-building-code-enforcement/planning-division/projects-of-high-interest/google-project>. The record of proceedings includes the EIR and all other documents and materials submitted to, or relied upon by, the lead agency in preparation of the EIR and approval of the project. Any document prepared by the lead agency or submitted by the applicant after the draft EIR's release date that is part of the record of proceedings, any comments received on the draft EIR, and other relevant documents or materials, will be made available to the public on this same website in a readily accessible electronic format within the time frames specified by AB 900. Together, these documents constitute the administrative record of proceedings. If the City of San José, as lead agency, approves the project, it must certify the final record of proceedings within 5 days of its approval.

As required by Public Resources Code Section 21185, the Judicial Council adopted rules of court establishing procedures for actions or proceedings brought to attack, review, set aside, void, or annul the certification of the EIR for an environmental leadership development project (certified by the Governor under AB 900) or the granting of any project approvals. The procedures require that the actions or proceedings, including any potential appeals, be resolved to the extent feasible within 270 days of the filing of the certified record of proceedings with the court. This creates an accelerated time frame for CEQA litigation. The procedures can be found in California Rules of Court Rules 3.2220 to 3.2231.

The provisions of AB 900, as amended, apply to projects that were certified by the Governor as environmental leadership development projects by January 1, 2020. This act remains in effect until January 1, 2021. In June and August 2020, differing versions of a bill (SB 995) to extend the provisions of AB 900 passed the California Senate and the California Assembly, respectively. However, the separate versions of the bill were not reconciled by the two chambers prior to the end of the 2019–2020 legislative session on August 31, 2020. Accordingly, AB 900 currently provides that if a lead agency fails to approve a project certified by the Governor before January 1, 2021, then the certification expires and is no longer valid. Nevertheless, the project

applicant has committed, even if no extension of AB 900 is forthcoming, that the project would provide the environmental benefits required under AB 900, including no net increase in GHG emissions. Therefore, this EIR assumes that the substantive requirements of AB 900 would continue to apply to the project, regardless of whether legislation is approved to extend the time period for approval of a Governor-certified project. Moreover, the City of San José is working with the President Pro Tempore of the State Senate, who authored SB 995, and with the City’s state legislative advocates and other cities affected by the failure of SB 995—including Los Angeles and San Diego—to encourage consideration of SB 995 in a Special Legislative Session that could be held this fall or as an urgency bill considered when the Legislature convenes in January 2021 and applied retroactively.¹⁰ Thus, it is reasonably foreseeable that either the provisions AB 900 will be extended or that the project would continue to meet the substantive requirements of AB 900.

1.4 Final Environmental Impact Report and Responses to Comments

After the conclusion of the 45-day public review and comment period, the City will prepare a final EIR in conformance with CEQA Guidelines Section 15132. The final EIR will consist of:

- Revisions to the draft EIR text, as necessary;
- A list of individuals and agencies commenting on the draft EIR;
- Responses to comments received on the draft EIR, in accordance with CEQA Guidelines (Section 15088); and
- Copies of letters received on the draft EIR.

CEQA Guidelines Section 15091(a) stipulates that no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project, unless the public agency makes one or more written findings. If the lead agency approves a project even though it would result in significant adverse environmental impacts that cannot be mitigated to a less-than-significant level, the agency must state the reasons for its action in writing. This “statement of overriding considerations” must be included in the record of project approval.

If the proposed project is approved, the City of San José will file a notice of determination, which will be available for public inspection and posted within 24 hours of receipt at the Santa Clara County Clerk’s Office for 30 days. The filing of the notice of determination starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15094(g)).

¹⁰ Kim Walesh, Deputy City Manager, Update on AB 900 and Proposed Google Mixed-Use Development, Memorandum to Mayor and City Council, September 11, 2020. Available at: <https://www.sanjoseca.gov/home/showdocument?id=63919>. Accessed September 21, 2020.

1.5 Organization of This EIR

This EIR is organized into six chapters, as described below:

- **Summary.** This chapter provides a concise overview of the proposed project and the necessary approvals; the environmental impacts that would result from the proposed project; mitigation measures identified to reduce or eliminate these impacts; project alternatives; and areas of known controversy and issues to be resolved.
- **Chapter 1, Introduction.** This chapter summarizes the proposed project and describes the type, purpose, and function of the EIR; the environmental review process and comments received on the NOP; and the organization of the EIR.
- **Chapter 2, Project Description.** This chapter presents objectives of the City and the applicant, the location of the site and project boundaries, characteristics of the proposed project, and required approval actions by the City and other agencies.
- **Chapter 3, Environmental Setting, Impacts, and Mitigation.** This chapter includes introductory material regarding the purpose of the EIR and its scope and approach to the analysis of a comprehensive range of environmental resource topics. Each topic section then presents the environmental setting; regulatory framework; approach to analysis; project-specific and cumulative impacts; and mitigation measures, when appropriate. This chapter contains the following sections and environmental resource topics:
 - 3.1, *Air Quality*
 - 3.2, *Biological Resources*
 - 3.3, *Cultural Resources and Tribal Cultural Resources*
 - 3.4, *Energy*
 - 3.5, *Geology, Soils, and Paleontological Resources*
 - 3.6, *Greenhouse Gas Emissions*
 - 3.7, *Hazards and Hazardous Materials*
 - 3.8, *Hydrology and Water Quality*
 - 3.9, *Land Use and Planning*
 - 3.10, *Noise and Vibration*
 - 3.11, *Population and Housing*
 - 3.12, *Public Services and Recreation*
 - 3.13, *Transportation*
 - 3.14, *Utilities and Service Systems*
- **Chapter 4, Other CEQA Issues.** This chapter addresses potential growth-inducing impacts of the proposed project and identifies significant effects that cannot be avoided if the proposed project is implemented, as well as significant irreversible environmental changes that would occur with the project.
- **Chapter 5, Alternatives.** This chapter presents and evaluates the no project alternative and five other alternatives to the proposed project that could feasibly attain most of the project objectives and avoid or substantially lessen identified significant adverse impacts. This chapter also describes other alternatives that were considered but were not analyzed in detail, and explains the reasons for this decision. Alternatives evaluated in this chapter include the following:
 - Alternative 1: No Project Alternative/DSAP Development Alternative
 - Alternative 2A: Historic Preservation Alternative
 - Alternative 2B: Historic Preservation & Airport CLUP Consistent Alternative
 - Alternative 3: 150 South Montgomery Street Preservation Alternative

- Alternative 4: Reduced Office Alternative
- Alternative 5: Reduced Intensity Alternative
- **Chapter 6, *Lead Agency and Preparers*.** This chapter lists the EIR lead agency and consultants.
- ***Appendices*.** The EIR has 20 appendices with information and analyses used in preparation of this EIR, including comments received from the public (see Appendix A1, *Notice of Preparation and Scoping Comments*).