CHAPTER 5
Alternatives

5.1 Criteria for Selecting Alternatives

CEQA requires that the EIR compare the effects of a "reasonable range of alternatives" to the effects of the project. The alternatives selected for comparison would attain most of the basic objectives of the project and avoid or substantially lessen one or more significant effects of the project (CEQA Guidelines Section 15126.6). The "range of alternatives" is governed by the "rule of reason" which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the decision-making body and informed public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors.

Therefore, each of the alternatives to the Specific Plan addressed in this EIR were selected based on the following factors:

1. The extent to which the alternative would accomplish most of the basic objectives of the Specific Plan (identified in Chapter 3);

2. The extent to which the alternative would avoid or lessen any of the identified significant and unavoidable environmental effects of adoption and development under the Specific Plan (discussed throughout Chapter 4);

3. The feasibility of the alternative, taking into account site suitability, availability of infrastructure, property control (ownership), and consistency with applicable plans and regulatory limitations;

4. The extent to which the alternative contributes to a "reasonable range" of alternatives necessary to permit a reasoned choice; and

5. The requirement of the CEQA Guidelines to consider a no-project alternative and to identify an environmentally superior alternative in addition to the no-project alternative (CEQA Guidelines, Section 15126.6(e)). The purpose of evaluating the no-project alternative is to allow decision makers to compare the impacts of approving the Specific Plan with the impacts of not approving the Specific Plan.

5.2 Significant Impacts

To determine alternatives that would avoid or lessen any of the identified significant and unavoidable environmental effects of adoption and development under the Specific Plan, the significant impacts must be considered. Impacts that are not mitigated to less than significant are considered "significant and unavoidable" ("SU"). The SU impacts identified for adoption and development under the Specific Plan are listed below.

SU Aesthetics Impacts

- **Impact AES-4:** Adoption and development under the Specific Plan could result in substantial new shadow that could shade the Temple Sinai. Although Mitigation Measure AES-4 would require a shadow study to evaluate the shadowing effects, it cannot be known with certainty that a project redesign would eliminate the potential for new significant shading on the Temple Sinai. Therefore, the impact is conservatively deemed significant and unavoidable.

- **Impact AES-5:** Adoption and development under the Specific Plan has the potential to result in adverse wind conditions in cases where structures 100 feet in height or taller are proposed for development. Although Mitigation Measure AES-5 would require a wind study to evaluate the effects of proposed development, it cannot be known with certainty that a project redesign would eliminate the potential for new adverse wind impacts. Therefore, the impact is conservatively deemed significant and unavoidable.

- **Impact AES-6:** For the reasons listed above, adoption and development under the Specific Plan is conservatively deemed to result in significant cumulative wind, and shadow impacts. Therefore, adoption and development under the Specific Plan, in combination with other past, present, and reasonably foreseeable future projects within and around the Plan Area, also is conservatively deemed significant and unavoidable.

SU Air Quality Impacts

- **Impact AIR-1:** Construction associated with adoption and development under the Specific Plan would result in average daily emissions in excess of 54 pounds per day of ROG. With the inclusion of Recommended Measure AIR-1, it cannot reliably be demonstrated that ROG emissions from application of architectural coatings associated with adoption and development under the Specific Plan would be reduced to 54 pounds per day or less. To assess full buildout of the Broadway Valdez Development Program under this threshold, which is intended for project-level analysis, aggressive and conservative assumptions were employed and thus yielded a conservative result. Therefore, the impact is conservatively deemed significant and unavoidable.

- **Impact AIR-2:** Adoption and development under the Specific Plan would result in operational average daily emissions of more than 54 pounds per day of ROG, NOX, or $PM_{2.5}$; 82 pounds per day of PM_{10}; or result in maximum annual emissions of 10 tons per year of ROG, NOX, or $PM_{2.5}$ or 15 tons per year of PM_{10}. Although implementation of SCA 25 and Recommended Measure AIR-2 would reduce environmental effects on air quality, adoption and development under the Specific Plan still would contribute substantially to an existing air quality violation (ozone precursors and particulate matter).

Therefore, even with implementation of Recommended Measure AIR-2, this impact would remain significant and unavoidable for emissions of ROG, NOX, and PM_{10}. To assess full buildout of the Broadway Valdez Development Program under this threshold, which is intended for project-level analysis, aggressive and conservative assumptions were employed and thus yielded a conservative result. Therefore, the significant and unavoidable determination is considered conservative.

- **Impact AIR-4:** Adoption and development under the Specific Plan could generate substantial levels of Toxic Air Contaminants (TACs) under cumulative conditions resulting in (a) a cancer risk level greater than 100 in a million, (b) a non-cancer risk (chronic or acute) hazard index greater than 10.0, or (c) annual average $PM_{2.5}$ of greater than 0.8 micrograms per cubic meter as a result of project operations. Although, due to the BAAQMD's permitting requirements, residual risk for a given generator would be less than 10 in one million, and although implementation of Mitigation Measure AIR-4 would substantially reduce potential cancer risks associated with DPM, the degree to which multiple sources, if concentrated on one area, would maintain cumulative risks to below 100 in one million cannot be assured. Therefore, the impact is conservatively deemed significant and unavoidable.

SU Cultural Resources Impacts

- **Impact CUL-1:** Adoption and development under the Specific Plan could result in the physical demolition, destruction, relocation, or alteration of historical resources that are listed in or may be eligible for listing in the federal, state, or local registers of historical resources.

- **Impact CUL-5:** Adoption and development under the Specific Plan, combined with cumulative development in the Plan Area and citywide, including past, present, existing, approved, pending, and reasonably foreseeable future development, would contribute considerably to a significant adverse cumulative impact to cultural resources.

SU Greenhouse Gas Impacts

- **Impact GHG-1:** Adoption and development under the Specific Plan would produce greenhouse gas emissions that exceed 1,100 metric tons of CO_2e per year that would exceed the project-level threshold of 4.6 metric tons of CO_2e per service population annually. Although future projects under the Specific Plan would be subject to SCA F, GHG Reduction Plan, according to the specific applicability criteria, and GHG emissions would be reduced through project-by-project implementation of project-specific reduction measures, it cannot be guaranteed that sufficient reductions can be achieved. Therefore, the impact is conservatively deemed significant and unavoidable.

SU Noise Impacts

- **Impact NOI-5:** Traffic generated by adoption and development under the Specific Plan could substantially increase traffic noise levels in the Plan Area.

- **Impact NOI-6:** Traffic generated by adoption and development under the Specific Plan, in combination with traffic from past, present, existing, approved, pending and reasonably foreseeable future projects, could substantially increase traffic noise levels in the Plan Area; and construction and operational noise levels in combination with traffic from past,

present, existing, approved, pending and reasonably foreseeable future projects, could increase ambient noise levels.

- **Impact NOI-7:** Adoption and development under the Specific Plan could result in stationary noise sources, such as rooftop mechanical equipment and back-up generators; that when combined with noise from traffic generated by adoption and development under the Specific Plan; as well as from past, present, existing, approved, pending and reasonably foreseeable future projects; could substantially increase noise levels at sensitive land uses in the Plan Area.

SU Transportation and Circulation Impacts

Existing Plus Project Conditions

- **Impact TRANS-2:** The development under the Specific Plan would degrade the *Perry Place/I-580 Eastbound Ramps/ Oakland Avenue* intersection **(Intersection #15)** from LOS E to LOS F and increase intersection average delay by four seconds or more during the weekday PM peak hour under Existing Plus Project conditions.

- **Impact TRANS-6:** The development under the Specific Plan Project would add more than 10 peak-hour trips to *23rd Street/Harrison Street* intersection **(Intersection #40)** which would meet peak-hour signal warrant under Existing Plus Project conditions. Although, with implementation of Mitigation Measure TRANS-6, this intersection may improve to LOS A during both weekday PM and Saturday peak hours, the specific improvements may result in potential secondary impacts at Grand Avenue/Harrison Street intersection (Intersection #52). Therefore, the impact is conservatively deemed significant and unavoidable.

2020 Plus Project Conditions

- **Impact TRANS-7:** The development under the Specific Plan would degrade the intersection from LOS E to LOS F and increase intersection average delay by four seconds or more, increase the total intersection v/c ratio by 0.03 or more, and increase the v/c ratio for a critical movement by 0.05 or more at the *Perry Place/I-580 Eastbound Ramps/ Oakland Avenue* intersection **(Intersection #15)** which would operate at LOS F during the weekday PM peak hour under 2020 conditions.

- **Impact TRANS-8:** The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more during the weekday PM peak hour which would operate at LOS F under 2020 conditions at the *Lake Park Avenue/Lakeshore Avenue* intersection **(Intersection #17)**.

- **Impact TRANS-10:** The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at an intersection operating at LOS F during the weekday AM and PM peak hours at the *27th Street/24th Street/Bay Place/Harrison Street* intersection **(Intersection #37)** under 2020 conditions.

- **Impact TRANS-12:** The development under the Specific Plan Project would add more than 10 peak-hour trips to *23rd Street/Harrison Street* **(Intersection #40)** intersection which would meet peak-hour signal warrant under 2020 Plus Project conditions. Although,

with implementation of Mitigation Measure TRANS-6, this intersection may improve to LOS B during the weekday PM peak hour and LOS A during the Saturday peak hour, the specific improvements may result in potential secondary impacts at Grand Avenue/Harrison Street intersection (Intersection #52). Therefore, the impact is conservatively deemed significant and unavoidable.

- **Impact TRANS-13:** The development under the Specific Plan would increase the v/c ratio for the total intersection by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at the West *Grand Avenue/Northgate Avenue* intersection **(Intersection #47)** which would operate at LOS F during the PM peak hour in 2020.

2035 Plus Project Conditions

- **Impact TRANS-14:** The development under the Specific Plan would increase the v/c ratio for a critical movement by 0.05 or more during the weekday PM and Saturday peak hours at the *51st Street/Pleasant Valley Avenue/Broadway* intersection **(Intersection #7)** under 2035 conditions.

- **Impact TRANS-17:** The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at an intersection operating at LOS F during the weekday PM peak hour at the *Perry Place/I-580 Eastbound Ramps/ Oakland Avenue* intersection **(Intersection #15)** under 2035 conditions.

- **Impact TRANS-18:** The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more at an intersection operating at LOS F during the Saturday peak hour at the *Grand Avenue/Lake Park Avenue/Santa Clara Avenue* **(Intersection #16)** intersection under 2035 conditions.

- **Impact TRANS-19:** The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at the *Lake Park Avenue/Lakeshore Avenue* intersection **(Intersection #17)** during the weekday PM and Saturday peak hours which would operate at LOS F under 2035 conditions.

- **Impact TRANS-20:** The development under the Specific Plan would degrade overall intersection operations from LOS E to LOS F and increase intersection average delay by four seconds or more during the weekday PM peak hour at the *Piedmont Avenue/Broadway and Hawthorne Avenue/Brook Street/Broadway* intersections **(Intersections #20 and #21)** under 2035 conditions.

- **Impact TRANS-21:** The development under the Specific Plan would increase the v/c ratio for the total intersection by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at the *27th Street/Telegraph Avenue* intersection **(Intersection #29)** which would operate at LOS F during the weekday PM peak hour under 2035 conditions.

- **Impact TRANS-22:** The development under the Specific Plan would degrade overall intersection operations from LOS E to LOS F and increase intersection average delay by four seconds or more during the weekday PM peak hour and at the *27th Street/ Broadway* intersection **(Intersection #30)** under 2035 conditions.

- **Impact TRANS-24:** The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at an intersection operating at LOS F during the weekday AM and PM peak hours and degrade overall intersection operations from LOS E to LOS F and increase intersection average delay by four seconds or more during the Saturday peak hour at the *27th Street/24th Street/Bay Place/Harrison Street* intersection **(Intersection #37)** under 2035 conditions.

- **Impact TRANS-26:** The development under the Specific Plan Project would add more than 10 peak-hour trips to *23rd Street/Harrison Street* intersection **(Intersection #40)** which would meet peak-hour signal warrant under 2035 Plus Project conditions. Although, with implementation of Mitigation Measure TRANS-6, this intersection may improve to LOS B during the weekday PM peak hour and LOS A during the Saturday peak hour, the specific improvements may result in potential secondary impacts at Grand Avenue/Harrison Street intersection (Intersection #52). Therefore, the impact is conservatively deemed significant and unavoidable.

- **Impact TRANS-27:** The development under the Specific Plan would increase the v/c ratio for the total intersection by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at the West *Grand Avenue/Northgate Avenue* intersection **(Intersection #47)** which would operate at LOS F during the weekday PM peak hour in 2035.

- **Impact TRANS-28:** The development under the Specific Plan would degrade intersection operations from LOS D to LOS F and increase intersection average delay by four seconds or more during the weekday PM peak hour at the *Grand Avenue/Broadway* intersection **(Intersection #49)** in 2035.

Roadway Segment Evaluation

- **Impact TRANS-29:** The development under the Specific Plan would degrade from LOS E or better to LOS F or increase the v/c ratio by 0.03 or more for segments operating at LOS F on the following CMP or MTS roadway segments:

  - MacArthur Boulevard in both eastbound and westbound directions between Piedmont Avenue and I-580 in 2020 and 2035.
  - Grand Avenue in the eastbound direction from Adeline Street to MacArthur Boulevard, and in westbound direction from Harrison Street to San Pablo Avenue in 2035.
  - Broadway in the northbound direction from 27th Street to College Avenue, and in the southbound direction from Piedmont Avenue to 27th Street in 2035.
  - Telegraph Avenue in the northbound direction from MacArthur Boulevard to Shattuck Avenue in 2035.
  - San Pablo Avenue in the southbound direction from Market Street to 27th Street in 2035.
  - Harrison Street in the northbound direction from 27th Street to Oakland Avenue in 2035.

Previous environmental documents have identified intersections that either currently operate at an unacceptable LOS or are projected to operate at an unacceptable LOS in the future. This EIR identifies these intersections as "impacted intersections" because components of the proposed project may affect those locations. Appendix G presents the intersections that previously published environmental documents identified as having significant and unavoidable impacts.

Under CEQA, the important consideration is whether the alternatives reduce significant impacts to less than significant. Each of the alternatives is discussed below. **Table 5-5** at the end of this chapter compares all the impacts of the Specific Plan to each of the alternatives and indicates whether the impacts would have the same, fewer, or greater effect on the environment.

5.3 Alternatives Selected for Consideration

The alternatives selected for evaluation in this EIR are summarized below.

1. **No Project Alternative 1:** Under this alternative, the Specific Plan would not be adopted, and therefore the Broadway Valdez Development Program would not occur. However, the No Project Alternative does include reasonably foreseeable development that could occur even without adoption and development under the Specific Plan. This includes certain already approved but not built projects in the Plan Area (Broadway West Grand Mixed-Use Project, Parcel B), as well as development that would reasonably be expected to occur in the Plan Area in accordance with existing plans, zoning, and regulatory framework.

2. **Partially Mitigated Alternative 2:** Under this alternative, the Plan Area would be developed at a reduced intensity (roughly 25 percent of the non-residential development compared with the Broadway Valdez Development Program). The mix of uses would shift such that a higher percentage of residential development would occur compared to commercial (retail and office) development. This alternative also would reduce maximum allowable heights on the parcel bounded by Webster, 29th Street, Broadway, and 28th Street, and would not amend the General Plan to expand the *Central Business District* land use designation. All other aspects of the Specific Plan would be adopted with this Alternative.

3. **Maximum Theoretical Buildout Alternative 3:** This alternative evaluates the theoretical possibility that every parcel would be built out to the new maximum level permissible under the General Plan and Planning Code regulations as revised through adoption of the Specific Plan. Under this alternative, the Plan Area would be developed at an increased density/intensity (roughly 300 percent of the residential development and 200 percent of non-residential development assumed in the Broadway Valdez Development Program). All other aspects of the Plan would occur with this Alternative.

4. **Historic Preservation Sub-Alternative:** The intent of this sub-alternative is to avoid the SU historic resources impacts identified for the Plan. Under this sub-alternative, development on sites with historic resources would be prohibited and thus no identified historic resources within the Plan Area would be demolished or significantly altered. In addition, allowable heights on the parcel bounded by Webster, 29th Street, Broadway, and 28th Street would be reduced such that new development within that parcel would avoid

adversely shading the stained glass windows of the Temple Sinai during morning worship periods. The development restrictions and limitations of this sub-alternative are assumed in the Partially Mitigated Alternative 2 and thus represented together with Alternative 2 in Tables 5.1, 5.3, and 5.5. The development restrictions and limitations of this sub-alternative also could be used in combination with the Specific Plan and thus are classified as a sub-alternative to provide for this flexibility. In this case, all other aspects of the Specific Plan would occur if combined with this sub-alternative.

The set of selected alternatives above are considered to reflect a "reasonable range" of feasible alternatives in that they include reduced scenarios that lessen and/or avoid significant and unavoidable effects, as well as less-than-significant effects, of the Specific Plan and generally would align with the basic objectives of the Plan, which the City would assess when it considers the merits of the Plan and the alternatives. The Plan is specific to the geography of the Broadway Valdez District; therefore this analysis does not consider an off-site alternative. A fully mitigated alternative that avoids nearly all of the SU impacts of the Plan is discussed in this analysis but is not evaluated in detail because it would be substantially inconsistent with the Specific Plan's basic objectives to achieve a "dynamic and active neighborhood" that is a "retail destination." Each of the selected alternatives is outlined in **Table 5-1, Summary of Alternatives to the Project**. Tables comparing the development program of each alternative to the Broadway Valdez Development Program are presented with the detailed description of each alternative and the alternative analyses in Section 5.4, *Comparative Alternatives Analysis*.

5.4 Comparative Alternatives Analysis

This section describes each alternative followed by a discussion of the impacts of the alternative compared with those identified with adoption and development under the Specific Plan. Impact comparisons to the Plan's SU impacts are highlighted in ***bold italic*** text for convenience.

The impacts associated with adoption and development under the Specific Plan and each alternative are for buildout conditions. Impacts are stated as levels of significance *after* implementation of mitigation measures identified in Chapter 4, and all applicable City Standard Conditions of Approval (SCA) are assumed to be part of each alternative, just as they are also assumed to be part of the Specific Plan.

As permitted by CEQA, the effects of the alternatives are discussed in less detail than the impact discussions for the Specific Plan in Chapter 4 (CEQA Guidelines Section 15126.6[d]). However, the alternatives analysis is conducted at a sufficient level of detail to provide the public, other public agencies, and City decision-makers adequate information to allow meaningful evaluation, analysis, and comparison with the Specific Plan as analyzed in Chapter 4.

TABLE 5-1
SUMMARY OF ALTERNATIVES TO THE PROJECT

	Broadway Valdez Development Program	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Residential Units	1,800	1,400	1,800	5,400
Office (sq. ft.)	700,000	120,000	300,000	2,090,000
Retail (sq. ft.)	1,100,000	140,000	150,000	1,670,000
Hotel Rooms	180	0	0	540
Non-Residential Development (sq. ft.)	*1,800,000*	*260,000*	*600,000*	*3,760,000*
Estimated Daily Trip Generation	40,301	12,908	17,293	65,953
Service Population				
Employees	4,500	650	1,210	10,400
Residents	3,230	2,500	3,230	9,690
Total	7,740	3,160	4,440	20,090
GHG Emissions				
Total Emissions (CO_2e)	38,116 MT/yr	**12,648 MT/yr**	**17,943 MT/yr**	77,693 MT/yr
GHG Emissions by Service Population (CO_2e)	4.9 MT/yr	**4.0 MT/yr**	**4.0 MT/yr**	**3.9 MT/yr**
Average Daily Construction Emissions (lb/day) (Worst Case Year)				
ROG	120 pounds per day (lb/day)	**72 lb/day**	**75 lb/day**	691 lb/day
NOx	55 lb/day	**40 lb/day**	**42 lb/day**	75 lb/day
Average Daily Operational Emissions (lb/day)				
ROG	181 pounds per day (lb/day)	**73 (lb/day)**	**99 (lb/day)**	404 (lb/day)
NOx	197 (lb/day)	**66 (lb/day)**	**90 (lb/day)**	348(lb/day)
PM_{10}	253(lb/day)	**87(lb/day)**	**119 (lb/day)**	443(lb/day)
Maximum Annual Operational Emissions (ton/year)				
ROG	31 tons per year (ton/yr)	**13 ton/yr**	**17 ton/yr**	70 ton/yr
NOx	36 ton/yr	**12 ton/yr**	**16 ton/yr**	63 ton/yr
PM_{10}	37 ton/yr	**13 ton/yr**	**17 ton/yr**	65 ton/yr

Bold and underlined formatted text indicates value is less than would occur with the Specific Plan.

SOURCE: Detailed tables for each of the data in this table are provided in Appendix I, *Alternatives Technical Background*, to this Draft EIR.

5.4.1 No Project Alternative 1

Description

Under the No Project Alternative, the Specific Plan would not be adopted; therefore, the Broadway Valdez Development Program would not occur. However, the No Project Alternative would include development that could occur even without adoption of the Specific Plan.[1] Under the No Project Alternative, non-residential development would be substantially less than with the Plan in place (14 percent of non-residential development assumed in the Broadway Valdez Development Program would occur). This extent of development would include reasonably foreseeable mixed-use developments in the Plan Area, such as Broadway-West Grand Parcel B, and the retail project, The Shops at Broadway, as well as other potential development and reuse throughout the Plan Area.

Table 5-2 shows the growth potential estimated based on development trends in the Plan Area vicinity, on known proposed project sites, and on existing land use and zoning. Future development under the No Project Alternative would continue to be consistent with the policies of the City of Oakland General Plan and specifically the Land Use and Transportation Element (LUTE), the Housing Element, and the Historic Preservation Element. Future development also would be subject to the City's Planning Code, Zoning Ordinance and Standard Conditions of Approval. Table 5-2 compares the No Project development to the Broadway Valdez Development Program.

TABLE 5-2
NO PROJECT ALTERNATIVE 1 COMPARED WITH THE BROADWAY VALDEZ DEVELOPMENT PROGRAM

	Broadway Valdez Development Program	No Project Alternative 1	% Change
Residential Units	1,800	1,400	-22%
Office (sq. ft.)	700,000	120,000	-83%
Retail (sq. ft.)	1,100,000	140,000	-87%
Hotel Rooms	180	0	-100%
Non-Residential Development (sq. ft.)	*1,800,000*	*260,000*	*-86%*
Estimated Trip Generation			
Daily	40,301	12,908	-68%
Weekday AM Peak Hour	1,980	701	-65%
Weekday PM Peak Hour	3,709	1,226	-67%
Saturday Peak Hour	4,114	1,387	-66%

SOURCE: Detailed trip generation calculations are provided in Appendix I, *Alternatives Technical Background*, to this Draft EIR

[1] The development assumptions incorporated into this alternatives analysis differ from the No Project scenario used for Plan development comparison in Section 4.13, *Transportation and Circulation*, which, for the purpose of conducting a conservative analysis, assumed no additional development in the Plan Area whatsoever.

Comparison of No Project Alternative 1 Impacts to the Plan's Impacts[2]

Aesthetics, Shadow and Wind

Similar to the adoption and development under the Specific Plan, individual developments that would occur under the No Project Alternative would be required to incorporate all the City's SCAs, as well as adhere to the City's design review process. Development under the No Project Alternative would be substantially less than with the Plan; therefore, the aesthetic effects from that development likely would continue to be less than significant as with adoption and development under the Specific Plan. While still considered less than significant (and not resulting from changes to existing conditions, on which the CEQA analysis focuses), it is worth noting that adoption and development under the Specific Plan would result in improved aesthetic conditions in the Plan Area that would not occur under the No Project Alternative.

Height limits in the existing Zoning Ordinance allow for taller structures in portions of the Plan Area than would be permitted with adoption of the Plan. Under the No Project Alternative, structures up to 75 feet would be permitted on the parcel bounded by Webster, 29th Street, Broadway, and 28th Street as opposed to 65 feet under the Plan's Physical Height Model (see Figure 3-11 in Chapter 3, *Project Description*). Therefore, taller projects proposed for development on that parcel would be required to evaluate the potential for new shading on the stained glass windows of the Temple Sinai during morning worship periods, and could be required to complete a shadow analysis (consistent with Mitigation Measure AES-4). Although there would be substantially less development compared with the Broadway Valdez Development Program, there still would be the potential for development to result in adverse shadow effects if new development is unable to fully avoid new shading on Temple Sinai, which would materially impair this resource's historic significance. At this time, it cannot be known with certainty that mitigations would prevent new development from resulting in adverse shadow effects. ***Therefore, the conservative SU shadow impact identified with the Plan (Impact AES-4, shading an historic resource), would continue to be conservatively SU under the No Project Alternative since new development still could potentially shade an historic resource.***

Under the No Project Alternative, there would be no amendment to the General Plan that would extend the *Central Business District* land use designation northward to 27th Street and throughout the Valdez subarea. Therefore, although height limits in the existing Zoning Ordinance allow for buildings up to 120 feet in portions of the Plan Area, the City's threshold requiring project sponsors proposing buildings 100 feet tall or taller within the *Central Business District*, to conduct detailed wind studies (consistent with Mitigation Measure AES-5), would not apply. ***Therefore, the conservative SU wind impact identified with adoption and development under the Specific Plan (Impact AES-5, adverse wind conditions) would be avoided under the No Project Alternative.***

The No Project Alternative would avoid the conservative SU wind impact identified with adoption and development under the Specific Plan. However, because it would not avoid the SU shadow impact, the No Project Alternative, when combined with cumulative development, would contribute

[2] Comparative discussion of SU impacts are shown in ***bold italic*** text.

to cumulative shadow effects. ***Therefore, conservative SU cumulative impact for shadow identified with the Plan (Impact AES-6), would continue under the No Project Alternative.***

Overall, the No Project Alternative would avoid the conservative SU wind impact but would have the same conservative SU shadow and cumulative impacts, and result in the same less than significant aesthetics impacts identified with adoption and development under the Specific Plan.

Air Quality

Given that substantially less development and related construction activity would occur under the No Project Alternative as compared with the Specific Plan, and the proportionally fewer new residents and workers that would occur in the Plan Area, air quality emissions and the potential for exposing new residents to air pollutants would be less than that identified for the Plan. However, even with an approximate 50 percent reduction in overall new building square footage constructed, as shown in Table 5.1, ROG emissions from application of architectural coatings would remain in excess of the 54 pounds per day threshold. ***Therefore, the conservative SU air quality impact identified with the Plan (Impact AIR-1, construction average daily emissions) would continue to be conservatively SU under the No Project Alternative since new development (although less than with the Plan) likely still would exceed the threshold for ROG.***

Although the development program would be substantially less when compared with the Plan, as demonstrated in Table 5.1, the No Project Alternative would continue to result in SU operational average daily emissions. ***Therefore, the conservative SU air quality impact identified with the Plan (Impact AIR-2, operational average daily and maximum annual emissions) would continue to be conservatively SU under the No Project Alternative since new development (although less than with the Plan) still would exceed thresholds.***

Under the No Project Alternative, although there would be substantially less development compared with the Broadway Valdez Development Program, there still would be the potential for multiple new sources of TACs, each with a cancer risk less than 10 in one million, to cumulatively increase cancer risks to greater than 100 in one million. ***Therefore, the conservative SU air quality impact identified with the Plan (Impact AIR-4, cumulative operational TAC impacts from new sources) would continue to be conservatively SU under the No Project Alternative since new development, under cumulative conditions, (although less than with the Plan) still could potentially exceed the cumulative threshold.***

The No Project Alternative also would result in the same less than significant air quality impacts that would occur with the Plan, and the No Project Alternative would be subject to the same air quality Recommended Measures, Mitigation Measures, and SCAs that would apply to the Plan.

Overall, the No Project Alternative would result in the same conservative SU and less-than-significant air quality impacts identified with the Plan, even though development would be substantially less compared with the Plan.

Biological Resources

Under the No Project Alternative, development still would occur in the Plan Area and the construction activities and operation of development could impact biological resources. Similar to the adoption and development under the Specific Plan, individual projects would be required to conform to all of the City's SCAs. Overall, given its reduced development, the No Project Alternative would maintain the same less-than-significant impacts on biological resources identified with the Plan, even though construction and development operations would be relatively less.

Cultural Resources

Under the No Project Alternative, although there would be substantially less development compared with the Broadway Valdez Development Program, there still would be the potential for development to effect historical resources if new development is unable to avoid, adaptively reuse, or appropriately relocate historically significant structures. ***Therefore, the SU historic resources impacts identified with the Plan (Impacts CUL-1 and CUL-5, impacts to historic resources – project and cumulative), would continue to be SU under the No Project Alternative.***

All other cultural resources impacts with the No Project Alternative would be less than significant as identified with adoption and development under the Specific Plan. Therefore, overall impacts to cultural resources under the No Project Alternative would result in the same SU and less-than-significant impacts as the Plan even though development would be at a substantially smaller scale compared with the Plan.

Geology, Soils and Geohazards

Under the No Project Alternative, development still would occur in the Plan Area and the construction activities and operation of development could expose residents to geologic hazards including strong ground shaking during a seismic event, as with adoption and development under the Specific Plan. However, as discussed above, new development would be at a smaller scale as compared with the Plan, and would therefore result in fewer new residents and workers in the Plan Area. As with the adoption and development under the Specific Plan, individual projects would be required to incorporate all applicable SCAs. Thus, the No Project Alternative would result the same less-than-significant impacts to geology, soils and geohazards as identified with the Plan, even though the extent of exposure and risks would be reduced given the reduced development and population.

Greenhouse Gases and Climate Change

The reduced development and related construction, operations and vehicle trips that would occur under the No Project Alternative would generate reduced annual greenhouse gas emissions compared with adoption and development under the Specific Plan. Further, in part due to residential development making up a higher percentage of the overall development assumed, the No Project Alternative would result in a larger service population relative to the estimated annual greenhouse gas emissions (see Table 5.1). As such, the No Project Alternative would result in GHG emissions per Service Population ratio below the threshold and avoid the SU impact.

Therefore, the conservative SU Greenhouse Gases and Climate Change impact identified with the Plan (Impact GHG-1, Greenhouse Gas Emissions), would be avoided under the No Project Alternative. Regardless, all applicable SCAs, including SCA F, *GHG Reduction Plan*, still would be incorporated in future developments, as applicable.

As with adoption and development under the Specific Plan, the No Project Alternative would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions. Overall, the No Project Alternative would result in the same less than significant greenhouse gas policy impacts, and avoid the conservative SU greenhouse gas emissions impacts identified with adoption and development under the Specific Plan.

Hazardous Materials

Under the No Project Alternative, development still would occur in the Plan Area and the construction activities involving demolition, soil disturbance and excavation could continue to potentially expose construction workers and residents to potential hazards and hazardous materials as identified for adoption and development under the Specific Plan. These potential hazardous materials include asbestos, PCBs, lead-based paint, contents of underground and aboveground storage tanks, and potentially contaminated soil and water. As with the Plan, any new construction would incorporate applicable City SCAs, and therefore would result in the same less-than-significant impacts associated with hazardous materials and hazards compared with adoption and development under the Specific Plan, even though the extent of exposure would be less given the reduced development that would occur under the No Project Alternative. Overall, the No Project Alternative would result in the same less-than-significant impacts identified with adoption and development under the Specific Plan.

Hydrology and Water Quality

Under the No Project Alternative, development still would occur in the Plan Area and the construction activities could lead to increased contaminants being washed into San Francisco Bay. Development under the No Project Alternative could alter drainage patterns and could be susceptible to flooding hazards or inundation. However, as discussed above, the No Project Alternative would have less new development than assumed in the Broadway Valdez Development Program. Any development would incorporate the City's applicable SCAs and implement best management practices. Therefore, impacts to water quality under the No Project Alternative would continue to be less than significant.

Land Use, Plans and Policies

Under the No Project Alternative, development still would occur in the Plan Area, but, as discussed above, development would be at a substantially smaller scale compared with the Plan. All new development would be required to be consistent with the General Plan and current Oakland Zoning designations. The reduced development would not introduce land uses unlike those identified with in the Broadway Valdez Development Program or locate these uses in a manner that would adversely affect existing communities or natural resources more than would the Plan. Therefore,

the No Project Alternative would result in the same less-than-significant land use impacts identified with adoption and development under the Specific Plan.

Noise

Given the substantially reduced scale of development and related construction activity that would occur under the No Project Alternative compared with the Plan, and the proportionally fewer new residents and workers that would occur in the Plan Area, construction and operational noise impacts would be less than identified with adoption and development under the Specific Plan. As with the Plan, any new construction would incorporate applicable City SCAs. Therefore, the No Project Alternative would have the same less-than-significant noise impacts as would occur with adoption and development under the Specific Plan.

The three SU noise impacts identified with adoption and development under the Specific Plan result primarily from traffic noise and traffic noise in combination with future operational noise. As demonstrated in Table 5.2, above, the No Project Alternative would result in substantially fewer new peak hour trips when compared with the Broadway Valdez Development Program. Roadway noise modeling based on the percentage decrease in project traffic contributions demonstrates that ***two of the three SU noise impacts identified with adoption and development under the Specific Plan (Impact NOI-5, traffic noise; and Impact NOI-6, cumulative traffic noise) would be avoided under the No Project Alternative.*** Additionally, impacts to one of the two significantly impacted receptors in Impact NOI-7 would be reduced to less than significant under this Alternative; however, ***the SU noise impact identified with adoption and development under the Specific Plan (Impact NOI-7, cumulative noise) would remain SU under the No Project Alternative*** given the second impacted receptor. Overall, the No Project Alternative would avoid two of the three SU noise impacts and have the same less-than-significant noise impacts identified with adoption and development under the Specific Plan since development would be substantially less compared with the Plan.

Population, Housing, and Employment

Under the No Project Alternative there would be substantially less development in the Plan Area compared with the Broadway Valdez Development Program. As a result, there would be substantially less total potential population (approximately 2,500 persons compared with 3,230, or 78 percent) and employment (approximately 650 jobs compared with 4,500, or 14 percent) under this Alternative. Therefore, the No Project Alternative would have the same less-than-significant impacts regarding the displacement of substantial housing, people, businesses, or jobs, as identified for adoption and development under the Specific Plan.

Public Services and Recreation Facilities

The demand for public services and recreation facilities under the No Project Alternative, and the use of such facilities, would be less than would occur with the Broadway Valdez Development Program. Compared with the public service demands associated with adoption and development under the Specific Plan, less police, fire and emergency services and facilities would be required, fewer students would be generated by the reduced housing, and the demand for and use of park

and recreational facilities would be less under the No Project Alternative. Thus, it is not anticipated that new physical facilities would be required, the construction of which could result in adverse environmental effects. Therefore, the No Project Alternative would have the same less-than-significant public services and recreation facilities impacts as identified with the Plan.

Transportation and Circulation

As shown in Table 5-2, the No Project Alternative would generate about one-third of the peak hour traffic generated by the Broadway Valdez Development Program. Although specific intersection evaluation was not conducted for the alternatives analysis, based on the trip generation estimates, it can be reasonably assumed that the No Project Alternative would eliminate most of the significant impacts on traffic operations identified with the Plan. However, it is anticipated that a few of the significant and unavoidable impacts at a few intersections would remain under the No Project Alternative; although the magnitude of these impacts would be much less than with adoption and development under the Specific Plan.

The No Project Alternative is expected to have similar effects on non-traffic operation topics; such as transportation safety and consistency with adopted policies, plans, or programs supporting alternative transportation.

Utilities and Service Systems

Under the No Project Alternative, the demands for utilities and service systems would be substantially less than with adoption and development under the Specific Plan given the reduced development that would occur. There would be notably less demand for water and energy services, and less need for increased wastewater and solid waste disposal. Therefore, the No Project Alternative would have the same less-than-significant utilities and service systems impacts as identified with adoption and development under the Specific Plan.

5.4.2 Partially Mitigated Alternative 2

Description

The Partially Mitigated Alternative would reduce the extent of growth and development anticipated within the Plan Area as a result of adoption and development under the Specific Plan. Therefore, the growth of new businesses and population also would be reduced. This alternative is designed with the goal of avoiding significant unavoidable impacts identified for the Broadway Valdez Development Program to less than significant levels. However, since the No Project Alternative would not avoid all identified SU impacts, and considering the extent of development reductions necessary to fully avoid all SU impacts, specifically those related to transportation and circulation, a “fully mitigated” alternative was eliminated from further consideration in this EIR (see subsection 5.6.2, below). Rather, the Partially Mitigated Alternative comprises a development program that is reduced to the greatest extent while continuing to be feasible from a market standpoint (i.e. not less development than assumed for the No Project Alternative) in combination with the Historic Preservation Sub-Alternative (see subsection 5.4.4 below).

While the Partially Mitigated Alternative would preserve the level of residential development within the Plan Area, the non-residential development represents an approximate 75 percent decrease when compared with the Broadway Valdez Development Program (see **Table 5-3**, below). The Partially Mitigated Alternative differs from the Specific Plan in that it would reduce maximum allowable heights on the parcel bounded by Webster, 29th Street, Broadway, and 28th Street, and would not amend the General Plan to expand *Central Business District* land use designation. All other aspects of the Specific Plan would be adopted with this alternative.

TABLE 5-3
PARTIALLY MITIGATED ALTERNATIVE 2 COMPARED WITH THE BROADWAY VALDEZ DEVELOPMENT PROGRAM

	Broadway Valdez Development Program	Partially Mitigated Alternative 2	% Change
Residential Units	1,800	1,800	0%
Office (sq. ft.)	700,000	300,000	-57%
Retail (sq. ft.)	1,100,000	150,000	-86%
Hotel Rooms	180	0	-100%
Non-Residential Development (sq. ft.)	*1,800,000*	*450,000*	*-75%*
Estimated Trip Generation			
Daily	40,301	17,293	-57%
Weekday AM Peak Hour	1,980	1,050	-47%
Weekday PM Peak Hour	3,709	1,585	-57%
Saturday Peak Hour	4,114	1,636	-60%

SOURCE: Detailed trip generation calculations are provided in Appendix I, *Alternatives Technical Background*, to this Draft EIR

Comparison of Partially Mitigated Alternative 2 Impacts to the Plan Impacts[3]

Aesthetics, Shadow and Wind

Similar to the adoption and development under the Specific Plan, individual developments that would occur under the Partially Mitigated Alternative would be required to incorporate all the City's SCAs, as well as adhere to the City's design review process. Development under the Partially Mitigated Alternative would be less than the Broadway Valdez Development Program, therefore the aesthetic effects from that development likely would continue to be less than significant.

As stated above, the Partially Mitigated Alternative assumes the development program above in combination with the aspects and constraints detailed in the Historic Preservation Sub-Alternative. Therefore, the Partially Mitigated Alternative would reduce the allowable heights on the parcel bounded by Webster, 29th Street, Broadway, and 28th Street such that new development would avoid shading the stained glass windows of the Temple Sinai during morning worship periods, and avoid the conservative SU shadow impact. ***Therefore, the conservative SU***

[3] Comparative discussion of SU impacts are shown in ***bold italic*** text.

shadow impact identified with the Plan (Impact AES-4, shading an historic resource), would be avoided under the Partially Mitigated Alternative.

The Partially Mitigated Alternative would not amend the General Plan to expand the *Central Business District* land use designation northward to 27th Street and throughout the Valdez subarea. As such, the City's threshold requiring project sponsors proposing buildings 100 feet tall or taller within the *Central Business District*, to conduct detailed wind studies (consistent with Mitigation Measure AES-5), would not apply. ***Therefore, the conservative SU wind impact identified with adoption and development under the Specific Plan (Impact AES-5, adverse wind conditions) would be avoided under the Partially Mitigated Alternative.***

The Partially Mitigated Alternative would avoid the conservative SU shadow and wind impacts identified with adoption and development under the Specific Plan. ***Therefore, conservative SU cumulative impacts for shadow and wind identified with the Plan (Impact AES-6), would be avoided under the Partially Mitigated Alternative.***

Overall, the Partially Mitigated Alternative would avoid the conservative SU impacts and have the same less than significant aesthetics impacts identified with adoption and development under the Specific Plan.

Air Quality

Given the reduced development program and related reduction in construction activity that would occur under the Partially Mitigated Alternative compared with the Specific Plan, and the proportionally fewer new residents and workers that would occur in the Plan Area, air quality emissions and the potential for exposing new residents to air pollutants would be less than that identified for the Plan. However, similar to the No Project Alternative, ROG emissions from application of architectural coatings would remain in excess of the 54 pounds per day threshold (see Table 5.1). ***Therefore, the conservative SU air quality impact identified with the Plan (Impact AIR-1, construction average daily emissions) would continue to be conservatively SU under the Partially Mitigated Alternative since new development (although less than with the Plan) would likely still exceed threshold for ROG.***

Although the development program would be less than the Broadway Valdez Development Program, as shown in Table 5.1, the Partially Mitigated Alternative would continue to result in SU operational average daily emissions. ***Therefore, the conservative SU air quality impact identified with the Plan (Impact AIR-2, operational average daily and maximum annual emissions) would continue to be conservatively SU under the Partially Mitigated Alternative since new development (although less than with the Plan) still would exceed thresholds.***

Under the Partially Mitigated Alternative, there still would be the potential for multiple new sources of TACs, each with a cancer risk less than 10 in one million, to cumulatively increase cancer risks to greater than 100 in one million. ***Therefore, the conservative SU air quality impact identified with the Plan (Impact AIR-4, cumulative operational TAC impacts from new sources) would continue to be conservatively SU under the Partially Mitigated Alternative***

since new development, under cumulative conditions, still could potentially exceed the cumulative threshold.

The Partially Mitigated Alternative also would result in the same less than significant air quality impacts that would occur with the Plan, and the new development would be subject to the same air quality Recommended Measures, Mitigation Measures, and SCAs that would apply to the Plan.

Overall, the Partially Mitigated Alternative would result in the same conservative SU and less-than-significant air quality impacts identified with the Plan, even though development would be substantially less compared with the Plan.

Biological Resources

Under the Partially Mitigated Alternative, development still would occur in the Plan Area and the construction activities and operation of development could impact biological resources. Similar to the adoption and development under the Specific Plan, individual projects would be required to conform to all the City's SCAs. Overall, given its reduced development, the Partially Mitigated Alternative would maintain the same less-than-significant impacts on biological resources identified with the Plan, even though construction and development operations would be relatively less.

Cultural Resources

As stated above, the Partially Mitigated Alternative would combine with the aspects and constraints detailed in the Historic Preservation Sub-Alternative. As such, new development would be prohibited from demolishing or damaging historically significant structures within the Plan Area. ***Therefore, the SU historic resources impacts identified with the Plan (Impacts CUL-1 and CUL-5, impacts to historic resources – project and cumulative), would be avoided under the Partially Mitigated Alternative.***

All other cultural resources impacts with the Partially Mitigated Alternative would be less than significant as identified with adoption and development under the Specific Plan. Therefore, overall impacts to cultural resources under the Partially Mitigated Alternative would result in the same less-than-significant impacts as the Plan and avoid the SU impacts identified for the Broadway Valdez Development Program.

Geology, Soils and Geohazards

Under the Partially Mitigated Alternative, development still would occur in the Plan Area and the construction activities and operation of development could expose residents to geologic hazards including strong ground shaking during a seismic event, as with adoption and development under the Specific Plan. However, as discussed above, new development would be at a smaller scale compared with the Plan, and would therefore result in fewer new residents and workers in the Plan Area. As with the adoption and development under the Specific Plan, individual projects would be required to incorporate all applicable SCAs. Thus, the Partially Mitigated Alternative

would result the same less-than-significant impacts to geology, soils and geohazards as identified with the Plan, even though the extent of exposure and risks would be reduced given the reduced development and population.

Greenhouse Gases and Climate Change

The reduced development and related construction, operations and vehicle trips that would occur under the Partially Mitigated Alternative would generate reduced annual greenhouse gas emissions compared with adoption and development under the Specific Plan. Further, in part due to residential development making up a higher percentage of the overall development assumed, the Partially Mitigated Alternative would result in a larger service population relative to the estimated annual greenhouse gas emissions (see Table 5.1). As such, the Partially Mitigated Alternative would result in GHG emissions per Service Population ratio below the threshold and avoid the SU impact. ***Therefore, the conservative SU Greenhouse Gases and Climate Change impact identified with the Plan (Impact GHG-1, Greenhouse Gas Emissions), would be avoided under the Partially Mitigated Alternative.*** Regardless, all applicable SCAs, including SCA F, *GHG Reduction Plan*, still would be incorporated in future developments, as applicable.

As with adoption and development under the Specific Plan, the Partially Mitigated Alternative would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions. Overall, the Partially Mitigated Alternative would result in the same less-than-significant greenhouse gas policy impacts, and avoid the SU greenhouse gas emissions impacts identified with adoption and development under the Specific Plan.

Hazardous Materials

Under the Partially Mitigated Alternative, development still would occur in the Plan Area and the construction activities involving demolition, soil disturbance and excavation would continue to have the potential to expose construction workers and residents to hazards and hazardous materials. These potential hazardous materials include asbestos, PCBs, lead-based paint, contents of underground and aboveground storage tanks, and potentially contaminated soil and water. As with the Plan, any new construction would incorporate applicable City SCAs, and therefore would result in the same less-than-significant impacts associated with hazardous materials and hazards compared with adoption and development under the Specific Plan, even though the extent of exposure would be less given the reduced development. Overall, the Partially Mitigated Alternative would result in the same less-than-significant impacts identified with adoption and development under the Specific Plan.

Hydrology and Water Quality

Under the Partially Mitigated Alternative, development still would occur in the Plan Area and the construction activities could lead to increased contaminants being washed into San Francisco Bay. Development under the Partially Mitigated Alternative could alter drainage patterns and could be susceptible to flooding hazards or inundation. However, as discussed above, the Partially Mitigated Alternative would have less new development than assumed in the Broadway Valdez Development Program. Any development would incorporate the City's applicable SCAs and

implement best management practices. Therefore, impacts to water quality under the Partially Mitigated Alternative would continue to be less than significant.

Land Use, Plans and Policies

Under the Partially Mitigated Alternative, development still would occur in the Plan Area, but, as discussed above, development would be at a smaller scale compared with the Plan. The reduced development would not introduce land uses unlike those identified with in the Broadway Valdez Development Program or locate these uses in a manner that would adversely affect existing communities or natural resources more than would the Plan. Therefore, the Partially Mitigated Alternative would result in the same less-than-significant land use impacts identified with adoption and development under the Specific Plan.

Noise

Given the reduced scale of development and related construction activity that would occur under the Partially Mitigated Alternative compared with the Plan, and the proportionally fewer new workers that would occur in the Plan Area, construction and operational noise impacts would be less than identified with adoption and development under the Specific Plan. As with the Plan, any new construction would incorporate applicable City SCAs. Therefore, the Partially Mitigated Alternative would have the same less-than-significant noise impacts as would occur with adoption and development under the Specific Plan.

The three SU noise impacts identified with adoption and development under the Specific Plan result primarily from traffic noise and traffic noise in combination with future operational noise. As demonstrated in Table 5.3, above, the Partially Mitigated Alternative would result in substantially fewer new peak hour trips when compared with the Broadway Valdez Development Program. Roadway noise modeling based on the percentage decrease in project traffic contributions demonstrates that ***two of the three SU noise impacts identified with adoption and development under the Specific Plan (Impact NOI-5, traffic noise and Impact NOI-6, cumulative traffic noise) would be avoided under the Partially Mitigated Alternative.*** Additionally, impacts to one of the two significantly impacted receptors in Impact NOI-7 would be reduced to less than significant under this Alternative; however, ***the SU noise impact identified with adoption and development under the Specific Plan (Impact NOI-7, cumulative noise) would remain SU under the Partially Mitigated Alternative*** given the second impacted receptor.

Overall, the Partially Mitigated Alternative would avoid two of the three SU noise impacts and have the same less-than-significant noise impacts identified with adoption and development under the Specific Plan since development would be substantially less compared with the Plan.

Population, Housing, and Employment

Under the Partially Mitigated Alternative there would be less development in the Plan Area compared with the Broadway Valdez Development Program. The development program for the Partially Mitigated Alternative would result in a population increase similar to the Broadway

Valdez Development Program (approximately 3,230) but would result in less total potential employment (approximately 2,000 jobs compared with 4,500, or 44 percent). Therefore, the Partially Mitigated Alternative would have the same less-than-significant impacts regarding the displacement of substantial housing, people, businesses or jobs, as identified for adoption and development under the Specific Plan.

Public Services and Recreation Facilities

The increase in population associated with the development that would occur under the Partially Mitigated Alternative would be less than would occur with the Broadway Valdez Development Program. Compared with the public service demands associated with adoption and development under the Specific Plan, less police, fire and emergency services and facilities would be required, and the demand for and use of park and recreational facilities would be less under the Partially Mitigated Alternative. The Partially Mitigated Alternative would generate the same number of students as the Broadway Valdez Development Program since the number of residential units would not change. Thus, it is not anticipated that new physical facilities would be required, the construction of which could result in adverse environmental effects. Therefore, the Partially Mitigated Alternative would have the same less-than-significant public services and recreation facilities impacts as identified with the Plan.

Transportation and Circulation

As shown in Table 5-3, the Partially Mitigated Alternative would generate at most about half of the peak hour traffic generated by the Broadway Valdez Development Program. Although specific intersection evaluation was not conducted for the alternatives analysis, based on the trip generation estimates, it can be reasonably assumed that the Partially Mitigated Alternative would eliminate most of the significant impacts on traffic operations identified with the Plan. However, it is anticipated that a few of the significant and unavoidable impacts at a few intersections would remain under the Partially Mitigated Alternative; although the magnitude of these impacts would be less than with adoption and development under the Specific Plan.

The Partially Mitigated Alternative is expected to have similar affects on non-traffic operation topics, such as transportation safety and consistency with adopted policies, plans, or programs supporting alternative transportation, because the Partially Mitigated Alternative would continue to provide similar policies as the Specific Plan.

Utilities and Service Systems

Under the Partially Mitigated Alternative, the demands for utilities and service systems would be less than with adoption and development under the Specific Plan given the reduced development that would occur. There would be less demand for water and energy services, and a smaller increase in the need for wastewater and solid waste disposal. Therefore, the Partially Mitigated Alternative would have the same less-than-significant utilities and service systems impacts as identified with adoption and development under the Specific Plan.

5.4.3 Maximum Theoretical Buildout Alternative 3

Description

The Broadway Valdez Development Program is based on a detailed analysis of available opportunity sites, historic turnover rates, and the estimated demand for new development in the Plan Area. This amount assumes that development and growth would not occur on all parcels. This is a reasonable assumption insofar as the Plan Area is mostly developed and the disparate, largely private ownership make it highly unlikely that new development and growth would exceed the "reasonably foreseeable" amount set forth in the Broadway Valdez Development Program. Thus the Broadway Valdez Development Program is the basis for analysis of the environmental effects of the Plan.

Although development and growth under the Broadway Valdez Development Program would not likely occur on every parcel, the revised land use designation, height limits and zoning regulations adopted with the Plan would in fact apply to all parcels within the Plan Area. Thus, theoretically, every parcel in the Plan Area could be "built out," consistent with the Specific Plan regulations. The Specific Plan regulations would increase the allowable density/intensity on Plan Area parcels relative to existing regulations embodied in the current General Plan and Planning Code, and because the Specific Plan's regulations would apply to every parcel within the Plan Area, the Maximum Theoretical Buildout Alternative 3 evaluates the theoretical possibility that every parcel would be built out to the new maximum level permissible under the General Plan and Planning Code regulations as revised through adoption of the Specific Plan.

Under the Maximum Theoretical Buildout Alternative, overall development would be substantially greater than the Broadway Valdez Development Program (roughly 300 percent of the residential development and 200 percent of non-residential development assumed in the Broadway Valdez Development Program). The growth potential is shown in **Table 5-4**, which compares the Maximum Theoretical Buildout Alternative with the Broadway Valdez Development Program. For the reasons stated above, the likelihood of "maximum buildout" occurring is considered so highly unlikely, if not impossible, it is referred to as theoretical.

TABLE 5-4
MAXIMUM THEORETICAL BUILDOUT ALTERNATIVE 3 COMPARED WITH THE BROADWAY VALDEZ DEVELOPMENT PROGRAM

	Broadway Valdez Development Program	Maximum Theoretical Buildout Alternative 3	% Change
Residential Units	1,800	5,400	300%
Office (sq. ft.)	700,000	2,090,000	300%
Retail (sq. ft.)	1,100,000	1,670,000	150%
Hotel Rooms	180	540	300%
Non-Residential Development (sq. ft.)	*1,800,000*	*3,760,000*	*210%*
Estimated Trip Generation			
Daily	40,301	65,953	164%
Weekday AM Peak Hour	1,980	4,237	214%
Weekday PM Peak Hour	3,709	6,346	171%
Saturday Peak Hour	4,114	6,960	169%

SOURCE: Detailed trip generation calculations are provided in Appendix I, *Alternatives Technical Background*, to this Draft EIR

The Maximum Theoretical Buildout Alternative assumes an increment of growth substantially greater than the Broadway Valdez Development Program and therefore would result in greater environmental effects for nearly every environmental topic considered. Most of the Plan's SU impacts would be substantially increased in intensity under Alternative 3 when compared with Broadway Valdez Development Program.

Comparison of Maximum Theoretical Buildout Alternative 3 Impacts to the Plan Impacts[4]

Aesthetics, Shadow and Wind

Similar to the adoption and development under the Specific Plan, individual developments that would occur under the Maximum Theoretical Buildout Alternative would be required to incorporate all the City's SCAs, as well as adhere to the City's design review process. Development under the Maximum Theoretical Buildout Alternative would be substantially greater than with the Plan, however, with adherence to the City's SCA's and design review process, new development likely would continue to be less than significant as with adoption and development under the Specific Plan.

Under the Maximum Theoretical Buildout Alternatives, there still would be the potential for development to result in adverse shadow effects if new development is unable to fully avoid new shading on Temple Sinai that would materially impair this resource's historic significance. ***Therefore, the conservative SU shadow impact identified with the Plan (Impact AES-4, shading an historic resource), would continue to be conservatively SU under the Maximum Theoretical Buildout Alternative since new development still could occur and could potentially shade an historic resource.***

Under the Maximum Theoretical Buildout Alternative, the Specific Plan would be adopted and the General Plan amended such that the *Central Business District* land use designation would be extended northward to 27th Street and throughout the Valdez subarea. As such, the City's threshold requiring project sponsors proposing buildings 100 feet tall or taller within the *Central Business District*, to conduct detailed wind studies (consistent with Mitigation Measure AES-5), would apply. As with the Plan, it cannot be known with certainty that a future project redesign would eliminate the potential for new adverse wind impacts. ***Therefore, the conservative SU wind impact identified with adoption and development under the Specific Plan (Impact AES-5, adverse wind conditions) would continue to be conservatively SU under the Maximum Theoretical Buildout Alternative.***

The Maximum Theoretical Buildout would have the same conservative SU shadow and wind impacts identified with adoption and development under the Specific Plan. As such, the Maximum Theoretical Buildout, when combined with cumulative development, would contribute to cumulative shadow and wind effects. ***Therefore, conservative SU cumulative impact for***

[4] Comparative discussion of SU impacts are shown in ***bold italic*** text.

shadow and wind identified with the Plan (Impact AES-6), would continue to be conservatively SU under the Maximum Theoretical Buildout Alternative.

Overall, the Maximum Theoretical Buildout Alternative would result in the same SU and less-than-significant aesthetics, shadow, and wind, and cumulative impacts identified with the Plan. In addition, because the Maximum Theoretical Buildout Alternative assumes an increment of growth substantially greater than the Broadway Valdez Development Program, the SU impacts related to Aesthetics, Shadow, and Wind would be substantially increased in intensity under Alternative 3 when compared with Broadway Valdez Development Program.

Air Quality

Given the substantially greater development and related construction activity that would occur under the Maximum Theoretical Buildout Alternative compared with the Broadway Valdez Development Program, and the greater increase in residents and workers that would occur in the Plan Area, air quality emissions and the potential for exposing new residents to air pollutants would be greater than that identified for the Plan. As shown in Table 5.1, the Maximum Theoretical Buildout Alternative would result in greater levels of construction, average daily operational, and maximum annual operational emissions when compared with the Plan. ***Therefore, the conservative SU air quality impact identified with the Plan (Impact AIR-1, construction average daily emissions and Impact AIR-2, operational average daily and maximum annual emissions) would continue to be conservatively SU under the Maximum Theoretical Buildout Alternative since new development still would exceed thresholds.***

Under the Maximum Theoretical Buildout Alternative, there still would be the potential for multiple new sources of TACs, each with a cancer risk less than 10 in one million, to cumulatively increase cancer risks to greater than 100 in one million. ***Therefore, the conservative SU air quality impact identified with the Plan (Impact AIR-4, cumulative operational TAC impacts from new sources) would continue to be conservatively SU under the Maximum Theoretical Buildout Alternative since new development, under cumulative conditions, still could potentially exceed the cumulative threshold.***

The Maximum Theoretical Buildout Alternative also would result in the same less than significant air quality impacts that would occur with the Plan, and the Maximum Theoretical Buildout Alternative would be subject to the same air quality Recommended Measures, Mitigation Measures, and SCAs that would apply to the Plan.

Overall, the Maximum Theoretical Buildout Alternative would result in the same conservative SU and less-than-significant air quality impacts identified with the Plan. In addition, because the Maximum Theoretical Buildout Alternative assumes an increment of growth substantially greater than the Broadway Valdez Development Program, the SU impacts related to Air Quality would be substantially increased in intensity under Alternative 3 when compared with Broadway Valdez Development Program.

Biological Resources

Under the Maximum Theoretical Buildout Alternative, development still would occur in the Plan Area and the construction activities and operation of development could impact biological resources. Similar to the Broadway Valdez Development Program, individual projects would be required to conform to all of the City's SCAs. Overall, the Maximum Theoretical Buildout Alternative would maintain the same less-than-significant impacts on biological resources identified with the Broadway Valdez Development Program, even though construction and development operations would be greater.

Cultural Resources

Under the Maximum Theoretical Buildout Alternative, all existing historic resource within the Plan Area would be developed and there still would be the potential for an adverse impact if new development is unable to avoid, adaptively reuse, or appropriately relocate historically significant structures. ***Therefore, the SU historic resources impacts identified with the Plan (Impacts CUL-1 and CUL-5, impacts to historic resources – project and cumulative), would continue to be SU under the Maximum Theoretical Buildout Alternative.***

All other cultural resources impacts with the Maximum Theoretical Buildout Alternative would be less than significant as identified with Broadway Valdez Development Program. Therefore, overall impacts to cultural resources under the Maximum Theoretical Buildout Alternative would result in the same SU and less-than-significant impacts as the Broadway Valdez Development Program. In addition, because the Maximum Theoretical Buildout Alternative assumes an increment of growth substantially greater than the Broadway Valdez Development Program, the SU impacts related to Cultural Resources would be substantially increased in intensity under Alternative 3 when compared with Broadway Valdez Development Program.

Geology, Soils and Geohazards

Under the Maximum Theoretical Buildout Alternative, development still would occur in the Plan Area and the construction activities and operation of development could expose residents to geologic hazards including strong ground shaking during a seismic event, as with the Broadway Valdez Development Program. New development would be at a greater scale compared with the Broadway Valdez Development Program, and would therefore result in more new residents and workers in the Plan Area. As with the Broadway Valdez Development Program, individual projects would be required to incorporate all applicable SCAs. Thus, the Maximum Theoretical Buildout Alternative would result the same less-than-significant impacts to geology, soils and geohazards as identified with the Broadway Valdez Development Program even though the extent of exposure and risks would be greater given the greater development and population. In addition, new buildings would be built to current code and thus provide greater life-safety measures.

Greenhouse Gases and Climate Change

The increased development and related construction, operations and vehicle trips that would occur under the Maximum Theoretical Buildout Alternative would generate more annual

greenhouse gas emissions compared to the Broadway Valdez Development Program. However, due to residential development making up a higher percentage of the overall development assumed, the Maximum Theoretical Buildout Alternative would result in a larger service population relative to the estimated annual greenhouse gas emissions (see Table 5.1). As such, the Maximum Theoretical Buildout Alternative would result in GHG emissions per Service Population ratio below the threshold and avoid the SU impact. ***Therefore, the conservative SU Greenhouse Gases and Climate Change impact identified with the Plan (Impact GHG-1, Greenhouse Gas Emissions), would be avoided under the Maximum Theoretical Buildout Alternative.*** Regardless, all applicable SCAs, including SCA F, *GHG Reduction Plan*, still would be incorporated in future developments, as applicable.

As with the Broadway Valdez Development Program, the Maximum Theoretical Buildout Alternative would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions. Overall, the Maximum Theoretical Buildout Alternative would result in the same less than significant greenhouse gas policy impacts, and SU greenhouse gas emissions impacts identified with adoption and development under the Specific Plan. This is the same finding as for the Maximum Theoretical Buildout Alternative and the Partially Mitigated Alternative.

Hazardous Materials

Under the Maximum Theoretical Buildout Alternative, development still would occur in the Plan Area and construction activities involving demolition, soil disturbance and excavation could continue to potentially expose construction workers and residents to potential hazards and hazardous materials as identified for adoption and development under the Specific Plan. These potential hazardous materials include asbestos, PCBs, lead-based paint, contents of underground and aboveground storage tanks, and potentially contaminated soil and water. As with the Broadway Valdez Development Program, any new construction would incorporate applicable City SCAs, and therefore would result in the same less-than-significant impacts associated with hazardous materials and hazards, even though the extent of exposure would be greater given the increased development that would occur under the Maximum Theoretical Buildout Alternative. Overall, the Maximum Theoretical Buildout Alternative would result in the same less-than-significant impacts identified with the Broadway Valdez Development Program.

Hydrology and Water Quality

Under the Maximum Theoretical Buildout Alternative, development still would occur in the Plan Area and the construction activities could lead to increased contaminants being washed into San Francisco Bay. Development under the Maximum Theoretical Buildout Alternative could alter drainage patterns and could be susceptible to flooding hazards or inundation. However, all new development would incorporate the City's applicable SCAs and implement best management practices. Therefore, impacts to water quality under the Maximum Theoretical Buildout Alternative would continue to be less than significant.

Land Use, Plans and Policies

Under the Maximum Theoretical Buildout Alternative, development still would occur in the Plan Area, but, as discussed above, development would be at a substantially greater scale compared with the Broadway Valdez Development Program. However, all new development would be required to be consistent with the General Plan and Oakland Zoning designations, as amended. The increased development would not introduce land uses unlike those identified with in the Broadway Valdez Development Program or locate these uses in a manner that would adversely affect existing communities or natural resources more than would the Broadway Valdez Development Program. Therefore, the Maximum Theoretical Buildout Alternative would result in the same less-than-significant land use impacts identified with the Broadway Valdez Development Program.

Noise

Given the substantially increased scale of development and related construction activity that would occur under the Maximum Theoretical Buildout Alternative compared with the Broadway Valdez Development Program, construction and operational noise impacts would be greater. However, any new construction would incorporate applicable City SCAs. Therefore, the Maximum Theoretical Buildout Alternative would have the same less-than-significant noise impacts as would occur with the Broadway Valdez Development Program.

The three SU noise impacts identified with adoption and development under the Specific Plan result primarily from traffic noise and traffic noise in combination with future operational noise. The Maximum Theoretical Buildout Alternative would result in substantially greater number of new daily trips when compared with the Broadway Valdez Development Program. ***Therefore, the three SU noise impacts identified with adoption and development under the Specific Plan (Impact NOI-5, traffic noise; Impacts NOI-6, cumulative traffic noise; and NOI-7, cumulative noise) would continue to be SU under the Maximum Theoretical Buildout Alternative.*** Additionally the roadway segment along 23rd Street west of Broadway would result in an additional significant impact under Impacts NOI-5 and NOI-6.

Overall, the Maximum Theoretical Buildout Alternative would have the same less-than-significant and SU noise impacts identified with adoption and development under the Specific Plan. In addition, because the Maximum Theoretical Buildout Alternative assumes an increment of growth substantially greater than the Broadway Valdez Development Program, the SU impacts related to Noise would be substantially increased in intensity under Alternative 3 when compared with Broadway Valdez Development Program.

Population, Housing, and Employment

Under the Maximum Theoretical Buildout Alternative there would be substantially greater development in the Plan Area compared with the Broadway Valdez Development Program. As a result, there would be substantially greater total potential population (approximately 9,690 persons compared with 3,230) and employment (approximately 10,400 jobs compared with 4,500) under this Alternative. Ultimately, the Maximum Theoretical Buildout Alternative population and

employment growth would represent approximately seven percent and 11 percent, respectively, of the anticipated growth Citywide between 2010 and 2035 (approximately 141,100 and 93,300, respectively, see Section 4.11, *Population, Housing, and Employment*). This level of development would absorb a greater portion of the region's anticipated population growth within the Plan Area. While this level of development is greater than described for the area within the Housing Element, it is within the level of growth anticipated, by the General Plan, for the City. Therefore, the Maximum Theoretical Buildout Alternative would have the same less-than-significant population, housing, and employment impacts identified for adoption and development under the Specific Plan.

Public Services and Recreation Facilities

When compared with the Broadway Valdez Development Program, substantially greater population growth and associated generation of new students would occur as a result of development under the Maximum Theoretical Buildout Alternative. The demand for public services, school facilities, and recreation facilities, and the use of such facilities, also would be greater under the Maximum Theoretical Buildout Alternative. Although all new development would be required to be consistent with the General Plan and to incorporate the City's SCAs, the potential remains that new or expanded public services, school, and recreational resources facilities may be required to maintain acceptable public services given the increased demand associated with the Maximum Theoretical Buildout Alternative to overwhelm existing. However, future development would incorporate all City SCA's related to construction activity to ensure less than significant effects, therefore, it is not assumed the potential construction of new facilities that could be needed would result in adverse environmental effects. In summary, the Maximum Theoretical Buildout Alternative would have the same less-than-significant public services and recreation impacts identified with the Broadway Valdez Development Program.

Transportation and Circulation

As shown in Table 5-1, the Maximum Theoretical Buildout Alternative would generate between 70 percent and 114 percent more traffic than would be generated by the Broadway Valdez Development Program. The Maximum Theoretical Buildout Alternative would continue to cause the same significant impacts as identified for the Plan. Although specific intersection evaluation was not conducted for the alternatives analysis, ssince the Maximum Theoretical Buildout Alternative would generate more traffic than the Plan, it can be reasonably assumed that it would cause additional significant, and significant and unavoidable impacts not identified for the Plan and increase the magnitude of the already identified significant and unavoidable impacts.

The Maximum Theoretical Buildout Alternative is expected to have similar affects on non-traffic operation topics, such as transportation safety and consistency with adopted policies, plans, or programs supporting alternative transportation, because the Maximum Theoretical Buildout Alternative would continue to provide similar policies as the Specific Plan.

Utilities and Service Systems

Under the Maximum Theoretical Buildout Alternative, the demands for utilities and service systems would be greater than with the Broadway Valdez Development Program given the

increased development that would occur. There would be a greater demand for water and energy services, and for increased wastewater and solid waste disposal. Therefore, it is possible that construction of new facilities that could be needed to accommodate the substantial level of increased development and demand.

The level of development and population growth under the Maximum Theoretical Buildout Alternative could result in the need to construct new or expanded utilities, including in particular water or wastewater facilities. All new development would be required to be consistent with the General Plan and to incorporate the City's SCAs, including in particular those intended to reduce adverse effects of construction activity to less than significant. New development under this alternative would also be required to adhere to all applicable federal, state and local statutes and regulations that would avoid adverse environmental effects related to energy and solid waste service demands.

Overall, the Maximum Theoretical Buildout Alternative would likely have the same less-than-significant utilities and service systems impacts as identified with the Broadway Valdez Development Program.

5.4.4 Historic Preservation Sub-Alternative

The intent of the Historic Preservation Sub-Alternative is to avoid the SU historic resources impacts identified for the Plan. The development restrictions and limitations of this sub-alternative are assumed in the Partially Mitigated Alternative 2 and thus represented together with Alternative 2 in Tables 5-1, 5-3, and 5-5. The development restrictions and limitations of this sub-alternative also could be used in combination with the Specific Plan and thus are classified as a sub-alternative to provide for this flexibility. However, this sub-alternative could not combine with the Maximum Theoretical Buildout Alternative 3 since that alternative assumes development on every parcel within the Plan Area.

Under the Historic Preservation Sub-Alternative, all identified historic resources within the Plan Area would be protected from demolition and significant alteration by prohibiting development on parcels where such resources are located. Specifically, this sub-alternative in combination with the Specific Plan, would avoid the SU historic resources impact identified for five Historic Resources (Biff's II Coffee Shop, 2401 Broadway, Connell GMC Pontiac Cadillac/Bay City Chevrolet building, the Seventh Church of Christ Scientist, and the Newsom Apartments) with adoption and development under the Specific Plan. ***Therefore, the SU historic resources impacts identified with the Plan (Impacts CUL-1 and CUL-5, impacts to historic resources – project and cumulative), would be avoided under the Historic Preservation Sub-Alternative.***

Further, this alternative would reduce the allowable heights on the parcel bounded by Webster, 29th Street, Broadway, and 28th Street such that new development would avoid shading the stained glass windows of the Temple Sinai during morning worship periods, and avoid the SU shadow impact. ***Therefore, the conservative SU shadow impact identified with the Plan (Impact AES-4, shading an historic resource), would be avoided under the Historic Preservation Sub-Alternative.***

All other aspects of the Plan or Alternative would occur with this sub-alternative.

5.5 Environmentally Superior Alternative

CEQA Guidelines require that the EIR identify an environmentally superior alternative (CEQA Guidelines, Section 15126.6), which is the CEQA alternative that reduces or avoids the environmental impacts identified for adoption and development under the Specific Plan to the greatest extent. The evaluation below first considers the extent to which each of the CEQA alternatives reduces or avoids the significant and unavoidable impacts identified with the Specific Plan. The extent to which an alternative reduces or avoids less-than-significant impacts identified with the Plan is also considered, balanced by consideration of the extent to which the impact affects the physical environment. The comparison of impacts resulting with the Plan and all of the alternatives discussed in this chapter is summarized in **Table 5-5**, Summary Comparison of Impacts, at the end of this chapter.

5.5.1 No Project Alternative 1

As summarized in **Table 5-5** below, and described in the analysis in Section 5.4 above, the No Project Alternative would reduce some of the SU impacts identified with the Plan to less than significant. Under the No Project Alternative, ***the conservative SU Aesthetics impact (AES-5), conservative SU Greenhouse Gases impact (GHG-1), SU Noise impacts (NOI-5 and NOI-6), and many of the Transportation impacts would no longer occur***. No impacts would be greater than those identified with the Plan.

However, Section 15126.6(e)(2) of the CEQA Guidelines requires that if the No Project Alternative is identified as the environmentally superior alternative, then the EIR shall identify another alternative as the environmentally superior alternative.

5.5.2 Partially Mitigated Alternative 2

The Partially Mitigated Alternative would be the environmentally superior alternative after consideration of the No Project Alternative. The Partially Mitigated Alternative would avoid several SU impacts that would occur with the Plan and with the other alternatives (other than the No Project Alternative, as discussed above). Specifically, as with the No Project Alternative, the Partially Mitigated Alternative would avoid ***the conservative SU Aesthetics impact (AES-5), conservative SU Greenhouse Gases impact (GHG-1), SU Noise impacts (NOI-5 and NOI-6), and many of the Transportation impacts would no longer occur***. ***In addition, the conservative SU Aesthetics impacts (AES-4 and AES-6), and SU Cultural Resources impacts (CUL-1 and CUL-5), would no longer occur***.

There are no SU impacts that would be avoided under the No Project Alternative, but that would still occur with the Partially Mitigated Alternative. However, many of the SU Transportation impacts that potentially would be reduced to less-than-significant under the No Project Alternative, potentially would be reduced under the Partially Mitigated but would continue to be

SU. Also, the Partially Mitigated Alternative would reduce the degree of each less-than-significant impact identified with the Plan given the reduced development that would occur. This alternative would also meet most of the basic objectives of the Specific Plan (which the City would assess when it considers the merits of the Plan and the alternatives), which are described in Chapter 3, Project Description. No impacts resulting with the Partially Mitigated Alternative would be greater than those identified with the Plan.

5.6 Alternatives Considered but Not Analyzed Further in the EIR

CEQA Guidelines Section 15126.6 sets forth several requirements regarding the consideration of alternatives in an EIR. Section 15126.6(a) and related case law hold that alternatives that are not reasonable or are infeasible need not be discussed at length; alternatives that do not offer substantial environmental advantages over the project can be rejected from consideration; and alternatives that do not accomplish most of the basic objectives of the project can be excluded from detailed analysis. Accordingly, this section briefly summarizes alternatives considered but rejected from further analysis, including the reasons for this rejection.

5.6.1 Off-site Location

As discussed above in Section 5.3, *Alternatives Selected for Consideration*, a range of alternatives was selected for analysis in this EIR that consider lesser and greater densities, alternative land uses, and revised regulations. In addition to the selected alternatives, an off-site location for the Specific Plan and a fully-mitigated alternative to the Plan were considered but rejected from further consideration in this EIR for the reasons discussed below.

In considering the range of alternatives to be analyzed in an EIR, CEQA Guidelines state that an alternative site location should be considered when feasible alternative locations are available and the "significant effects of the project would be avoided or substantially lessened by putting the project in another location" (CEQA Guidelines, Section 15126.6(f)).

This alternative would consist of increasing allowable growth in another location in the City of Oakland. However, it fails to meet the basic objectives of the Specific Plan – fostering growth within the Broadway Valdez District Area (which the City would assess when it considers the merits of the Plan and the alternatives). This alternative would preserve existing land use regulations within the Plan Area, as described under the No Project Alternative. In addition, this alternative would focus new growth elsewhere in the City and thus would not avoid the majority of SU impacts identified for the Plan. For these reasons, the City did not forward an off-site location alternative for further evaluation in this EIR.

5.6.2 "Fully Mitigated" Alternative

As more fully described under Alternative 1, the No Project Alternative would avoid many of the SU impacts identified for the Plan. However, SU impacts related to shadow, cultural resources,

construction emissions, operational emissions, noise, and transportation would persist. As more fully described under Alternative 2, the Partially Mitigated Alternative avoids the same SU impacts as the No Project Alternative and further avoids impacts related to shadow and cultural resources. However, SU impacts from construction emissions, operational emissions, noise, and transportation would continue to be SU under this alternative.

A fully mitigated alternative would avoid the SU impacts from construction emissions, operational emissions, noise, and traffic that would continue to occur with the alternatives fully analyzed in this EIR. To achieve a fully mitigated alternative, the development projections for the 25 year planning period would have to be reduced by approximately 73 percent compared to the Broadway Valdez Development Program. This development scenario would be significantly less than development under the No Project Alternative. In addition, a fully mitigated alternative would have to modify the location and type of development that would occur within the Plan Area, as these factors affect the traffic impacts. The following scenarios would avoid the SU impacts on traffic:

- About 20,000 square feet of retail development in the North End; or
- About 100 multi-family residential units, 30,000 square feet of retail, and 60,000 square feet of office in the Valdez Triangle.

Development of this scale would avoid the SU operational emissions and traffic impacts identified with the Plan, it would not necessarily avoid the SU impacts related to greenhouse gas emissions. Further, this hypothetical reduced development scenario would not accomplish most of the Plan's basic objectives, which the City would assess when it considers the merits of the Plan and the alternatives. For these reasons a fully mitigated alternative is not likely feasible, and the City chose to not forward it for further consideration in this EIR.

5.7 Summary

In summary, the Partially Mitigated Alternative 2 is considered the environmentally superior alternative as it would avoid and/or substantially reduce SU impacts of the Plan to the greatest extent compared with the Broadway Valdez Specific Plan and still meet the basic objectives of the Specific Plan, which the City would assess when it considers the merits of the Plan and the alternatives.

TABLE 5-5
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Aesthetics, Shadow and Wind				
Impact AES-1: Adoption and development under the Specific Plan would not adversely affect scenic public vistas or views of scenic resources (Criteria 1 and 2). (Less than Significant)	LS	LS	LS	LS
Impact AES-2: Adoption and development under the Specific Plan would not substantially degrade the existing visual character or quality of the site and its surroundings (Criterion 3). (Less than Significant)	LS	LS	LS	LS
Impact AES-3: Adoption and development under the Specific Plan would result in new sources of light or glare which would not substantially and adversely affect day or nighttime views in the area (Criterion 4). (Less than Significant)	LS	LS	LS	LS
Impact AES-4: Adoption and development under the Specific Plan could result in substantial new shadow that would shade solar collectors, passive solar heaters, public open spaces, or historic resources or otherwise result in inadequate provision of adequate light (Criteria 5 through 9). (Conservatively Significant and Unavoidable)	Conservatively SU	Conservatively SU	LS	Conservatively SU⇧
Impact AES-5: Adoption and development under the Specific Plan has the potential to result in adverse wind conditions (Criterion 10). (Conservatively Significant and Unavoidable)	Conservatively SU	LS	LS	Conservatively SU⇧
Impact AES-6: Adoption and development under the Specific Plan, in combination with other past, present, and reasonably foreseeable future projects within and around the Plan Area, would result in significant cumulative wind, and shadow impacts. (Conservatively Significant and Unavoidable)	Conservatively SU	Conservatively SU	LS	Conservatively SU⇧
Air Quality				
Impact AIR-1: Construction associated with adoption and development under the Specific Plan would result in average daily emissions of 54 pounds per day of ROG, NO_X, or $PM_{2.5}$ or 82 pounds per day of PM_{10} (Criterion 1). (Conservatively Significant and Unavoidable)	Conservatively SU	Conservatively SU⇩	Conservatively SU⇩	Conservatively SU⇧
Impact AIR-2: Adoption and development under the Specific Plan would result in operational average daily emissions of more than 54 pounds per day of ROG, NO_X, or $PM_{2.5}$ or 82 pounds per day of PM_{10}; or result in maximum annual emissions of 10 tons per year of ROG, NO_X, or $PM_{2.5}$ or 15 tons per year of PM_{10} (Criterion 2). (Conservatively Significant and Unavoidable)	Conservatively SU	Conservatively SU⇩	Conservatively SU⇩	Conservatively SU⇧

Legend
LS Less than significant or negligible impact; no mitigation required
LSM Less than significant impact, after mitigation
SU Significant and unavoidable adverse impact, after mitigation or standard conditions
N No impact
⇧⇩ Impact is more severe or less severe than project impact, after mitigation, but with no change in impact determination; **Changes from proposed project impact determination shown in bold**

TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Air Quality (cont.)				
Impact AIR-3: Adoption and development under the Specific Plan would not contribute to carbon monoxide (CO) concentrations exceeding the California Ambient Air Quality Standards (CAAQS) of nine parts per million (ppm) averaged over eight hours and 20 ppm for one hour (Criterion 3). (Less than Significant)	LS	LS ⇩	LS ⇩	LS⇧
Impact AIR-4: Adoption and development under the Specific Plan could generate substantial levels of Toxic Air Contaminants (TACs) resulting in (a) a cancer risk level greater than 10 in one million, (b) a non-cancer risk (chronic or acute) hazard index greater than 1.0, or (c) an increase of annual average $PM_{2.5}$ concentration of greater than 0.3 micrograms per cubic meter or, under cumulative conditions, resulting in (a) a cancer risk level greater than 100 in a million, (b) a non-cancer risk (chronic or acute) hazard index greater than 10.0, or (c) annual average $PM_{2.5}$ of greater than 0.8 micrograms per cubic meter as a result of construction activities or project operations (Criterion 4). (Conservatively Significant and Unavoidable)	Conservatively SU	Conservatively SU⇩	Conservatively SU⇩	Conservatively SU⇧
Impact AIR-5: Adoption and development under the Specific Plan would not expose sensitive receptors to substantial levels of Toxic Air Contaminants (TACs) resulting in (a) a cancer risk level greater than 100 in one million, (b) a non-cancer risk (chronic or acute) hazard index greater than 10.0, or (c) an increase of annual average $PM_{2.5}$ concentration of greater than 0.8 micrograms per cubic meter by siting a new sensitive receptor (Criterion 5). (Less than Significant)	LS	LS	LS	LS
Impact AIR-6: Adoption and development under the Specific Plan would not frequently and for a substantial duration, create or expose sensitive receptors to substantial objectionable odors affecting a substantial number of people (Criterion 6). (Less than Significant)	LS	LS	LS	LS
Impact AIR-7: Adoption and development under the Specific Plan would be consistent with the primary goals of the Bay Area Clean Air Plan (CAP) and would not fundamentally conflict with the CAP because the Specific Plan demonstrates reasonable efforts to implement control measures contained in the CAP (Criterion 7). (Less than Significant)	LS	LS	LS	LS
Impact AIR-8: Adoption and development under the Specific Plan would include special overlay zones containing goals, policies, and objectives to minimize potential Toxic Air Contaminant (TAC) impacts in areas located (a) near existing and planned sources of TACs and (b) within 500 feet of freeways and high-volume roadways containing 100,000 or more average daily vehicle trips (Criterion 8). (Less than Significant)	LS	LS	LS	LS

Legend
LS Less than significant or negligible impact; no mitigation required
LSM Less than significant impact, after mitigation
SU Significant and unavoidable adverse impact, after mitigation or standard conditions
N No impact
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TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Air Quality (cont.)				
Impact AIR-9: Adoption and development under the Specific Plan would not identify existing and planned sources of odors with policies to reduce potential odor impacts (Criterion 9). (Less than Significant)	LS	LS	LS	LS
Biological Resources				
Impact BIO-1: Adoption and development under the Specific Plan could adversely affect, either directly or through habitat modifications, any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (Criterion 1). (Less than Significant)	LS	LS ⇩	LS ⇩	LS⇧
Impact BIO-2: Adoption and development under the Specific Plan could have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (Criterion 2). (Less than Significant)	LS	LS ⇩	LS ⇩	LS⇧
Impact BIO-3: Adoption and development under the Specific Plan could have a substantial adverse effect on federally protected wetlands (as defined by Section 404 of the Clean Water Act) or state protected wetlands, through direct removal, filling, hydrological interruption, or other means (Criterion 3). (Less than Significant)	LS	LS ⇩	LS ⇩	LS⇧
Impact BIO-4: Adoption and development under the Specific Plan could substantially interfere with the movement of any 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 (Criterion 4). (Less than Significant)	LS	LS ⇩	LS ⇩	LS⇧
Impact BIO-5: Adoption and development under the Specific Plan could fundamentally conflict with the City of Oakland Tree Protection Ordinance (Oakland Municipal Code Chapter 12.36) by removal of protected trees under certain circumstances (Criterion 6). (Less than Significant)	LS	LS ⇩	LS ⇩	LS⇧

Legend
LS Less than significant or negligible impact; no mitigation required
LSM Less than significant impact, after mitigation
SU Significant and unavoidable adverse impact, after mitigation or standard conditions
N No impact
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TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Biological Resources (cont.)				
Impact BIO-6: Adoption and development under the Specific Plan could fundamentally conflict with the City of Oakland Creek Protection Ordinance (OMC Chapter 13.16) intended to protect biological resources (Criterion 7). (Less than Significant)	LS	LS ⇩	LS ⇩	LS⇧
Impact BIO-7: Construction activity and operations of adoption and development under the Specific Plan, in combination with past, present, existing, approved, pending and reasonably foreseeable future projects in the Plan Area, would not result in impacts on special-status species, sensitive habitats, wildlife movement corridors, wetlands, and other waters of the U.S. (Less than Significant)	LS	LS ⇩	LS ⇩	LS⇧
Cultural Resources				
Impact CUL-1: Adoption of and development under the Specific Plan could result in the physical demolition, destruction, relocation, or alteration of historical resources that are listed in or may be eligible for listing in the federal, state, or local registers of historical resources (Criterion 1). (Significant and Unavoidable)	SU	SU⇩	LS	SU⇧
Impact CUL-2: Adoption of and development under the Specific Plan could result in significant impacts to unknown archaeological resources (Criterion 2). (Less than Significant)	LS	LS ⇩	LS ⇩	LS⇧
Impact CUL-3: Adoption of and development under the Specific Plan could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (Criterion 3). (Less than Significant)	LS	LS ⇩	LS ⇩	LS⇧
Impact CUL-4: Adoption of and development under the Specific Plan could disturb human remains, including those interred outside of formal cemeteries (Criterion 4). (Less than Significant)	LS	LS ⇩	LS ⇩	LS⇧
Impact CUL-5: Adoption of and development under the Specific Plan, combined with cumulative development in the Plan Area and citywide, including past, present, existing, approved, pending, and reasonably foreseeable future development, would contribute considerably to a significant adverse cumulative impact to cultural resources. (Significant and Unavoidable)	SU	SU⇩	LS	SU⇧

Legend
LS Less than significant or negligible impact; no mitigation required
LSM Less than significant impact, after mitigation
SU Significant and unavoidable adverse impact, after mitigation or standard conditions
N No impact
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TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Geology, Soils and Geohazards				
Impact GEO-1: Adoption and development under the Specific Plan could expose people or structures to seismic hazards such as ground shaking and seismic-related ground failure such as liquefaction, differential settlement, collapse, or lateral spread (Criterion 1). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact GEO-2: Adoption and development under the Specific Plan could be subjected to geologic hazards, including expansive soils, subsidence, seismically-induced settlement and differential settlement (Criterion 3). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact GEO-3: Adoption and development under the Specific Plan, when combined with other past, present, existing, approved, pending and reasonably foreseeable development in the vicinity, would not result in significant cumulative impacts with respect to geology, soils or seismicity. (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Greenhouse Gases and Climate Change				
Impact GHG-1: Adoption and development under the Specific Plan would produce greenhouse gas emissions that exceed 1,100 metric tons of CO_{2e} per year, that would exceed 4.6 metric tons of CO_2e per service population annually (Criterion 1). (Conservatively Significant and Unavoidable)	Conservatively SU	LS	LS	LS
Impact GHG-2: Adoption and development under the Specific Plan would not conflict with an applicable plan, policy or regulation of an appropriate regulatory agency adopted for the purpose of reducing greenhouse gas emissions (Criterion 2). (Less than Significant)	LS	LS	LS	LS
Hazards and Hazardous Materials				
Impact HAZ-1: Adoption and development under the Specific Plan would result in an increase in the routine transportation, use, and storage of hazardous chemicals (Criteria 1 and 3). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧

Legend
LS Less than significant or negligible impact; no mitigation required
LSM Less than significant impact, after mitigation
SU Significant and unavoidable adverse impact, after mitigation or standard conditions
N No impact
⇧⇩ Impact is more severe or less severe than project impact, after mitigation, but with no change in impact determination; **Changes from proposed project impact determination shown in bold**

TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Hazards and Hazardous Materials (cont.)				
Impact HAZ-2: Adoption and development under the Specific Plan would result in the accidental release of hazardous materials used during construction through improper handling or storage (Criterion 2). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact HAZ-3: Adoption and development under the Specific Plan would result in the exposure of hazardous materials in soil and ground water (Criteria 2 and 5). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact HAZ-4: Adoption and development under the Specific Plan would result in the exposure of hazardous building materials during building demolition (Criterion 2). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact HAZ-5: Adoption and development under the Specific Plan would require use of hazardous materials within 0.25 mile of a school (Criterion 4). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact HAZ-6: Development under Specific Plan could result in fewer than two emergency access routes for streets exceeding 600 feet in length but would not physically interfere with an adopted emergency response plan or emergency evacuation plan (Criteria 6 and 9). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact HAZ-7: Adoption and development under the Specific Plan, when combined with other past, present, existing, approved, pending and reasonably foreseeable development in the vicinity, would result in cumulative hazards. (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Hydrology and Water Quality				
Impact HYD-1: Adoption and development under the Specific Plan would alter drainage patterns and increase the volume of stormwater, or the level of contamination or siltation in stormwater flowing from the Plan Area (Criteria 1 and 3 through 7). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact HYD-2: Adoption and development under the Specific Plan could be susceptible to flooding hazards as a result of being placed in a 100-year flood zone as mapped by FEMA (Criteria 8 through 10). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧

Legend
LS Less than significant or negligible impact; no mitigation required
LSM Less than significant impact, after mitigation
SU Significant and unavoidable adverse impact, after mitigation or standard conditions
N No impact
⇧⇩ Impact is more severe or less severe than project impact, after mitigation, but with no change in impact determination; **Changes from proposed project impact determination shown in bold**

TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Hydrology and Water Quality (cont.)				
Impact HYD-3: Adoption and development under the Specific Plan could be susceptible to flooding hazards in the event of dam or reservoir failure (Criterion 10). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact HYD-4: Adoption and development under the Specific Plan could be susceptible to inundation in the event of sea-level rise (Criterion 10). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact HYD-5: Adoption and development under the Specific Plan would not adversely affect the availability of groundwater supplies or interfere substantially with groundwater recharge (Criterion 2) (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact HYD-6: Adoption and development under the Specific Plan would not be susceptible to mudflow, seiche, and tsunami-related hazards (Criterion 11). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact HYD-7: Adoption and development under the Specific Plan, combined with past, present, existing, approved, pending, and reasonably foreseeable future projects would not result in potentially significant cumulative impacts to hydrologic resources. (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Land Use, Plans and Policies				
Impact LU-1: Adoption and development under the Specific Plan would not result in the physical division of an existing community or conflict with adjacent or nearby land uses (Criteria 1 and 2). (Less than Significant)	LS	LS	LS	LS
Impact LU-2: Adoption and development under the Specific Plan would not conflict with applicable land use plans and policies adopted for the purpose of avoiding or mitigating an environmental effect (Criterion 3). (Less than Significant)	LS	LS	LS	LS
Impact LU-3: Adoption and development under the Specific Plan would not fundamentally conflict with any applicable habitat conservation plan or natural community conservation plan (Criterion 4). (Less than Significant)	LS	LS	LS	LS
Impact LU-4: Development under the Specific Plan, combined with cumulative development in the defined geographic area, including past, present, existing, approved, pending, and reasonably foreseeable future development, does not reveal any significant adverse cumulative impacts in the area. (Less than Significant)	LS	LS	LS	LS

Legend
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TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Noise				
Impact NOI-1: Adoption and development under the Specific Plan would not result in substantial temporary or periodic increases in ambient noise levels in the Plan Area above existing levels without the Specific Plan and in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (Criteria 1, 2 and 8). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact NOI-2: Adoption and development under the Specific Plan would not increase operational noise levels in the Plan Area to levels in excess of standards established in the Oakland Noise Ordinance and Planning Code (Criterion 3). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact NOI-3: Adoption and development under the Specific Plan would not expose persons to exterior noise levels in conflict with the land use compatibility guidelines of the Oakland General Plan after incorporation of all applicable Standard Conditions of Approval (Criterion 6). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact NOI-4: Adoption and development under the Specific Plan would not expose persons to interior Ldn or CNEL greater than 45 dBA for multi-family dwellings, hotels, motels, dormitories and long-term care facilities in the Plan Area to noise levels in excess of standards established in the Oakland Noise Ordinance and Planning Code (Criterion 5). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact NOI-5: Traffic generated by adoption and development under the Specific Plan could substantially increase traffic noise levels in the Plan Area (Criterion 4). (Significant and Unavoidable)	SU	LS	LS	SU⇧
Impact NOI-6: Traffic generated by adoption and development under the Specific Plan, in combination with traffic from past, present, existing, approved, pending and reasonably foreseeable future projects, could substantially increase traffic noise levels in the Plan Area; and construction and operational noise levels in combination with traffic from past, present, existing, approved, pending and reasonably foreseeable future projects, could increase ambient noise levels (Criterion 4). (Significant and Unavoidable)	SU	LS	LS	SU⇧
Impact NOI-7: Stationary noise sources such as rooftop mechanical equipment and back-up generators in combination with traffic generated by adoption and development under the Specific Plan; and from past, present, existing, approved, pending and reasonably foreseeable future projects; could substantially increase noise levels at sensitive land uses in the Plan Area; (Criterion 4). (Significant and Unavoidable)	SU	SU⇩	SU⇩	SU⇧

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TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Population, Housing, and Employment				
Impact POP-1: Adoption and development under the Specific Plan could induce population growth, but not in a manner not anticipated in the General Plan (Criterion 1). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact POP-2: Adoption and development under the Specific Plan could displace existing housing and residents, but not in substantial numbers necessitating the construction of replacement housing elsewhere, in excess of that anticipated in the City's Housing Element (Criteria 2 and 3). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact POP-3: Adoption and development under the Specific Plan individually and in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects would not induce substantial population growth in a manner not contemplated in the General Plan, either directly by facilitating new housing or businesses, or indirectly through infrastructure improvements, such that additional infrastructure is required but the impacts of such were not previously considered or analyzed. (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Public Services, Parks and Recreation				
Impact PSR-1: Adoption and development under the Specific Plan could result in an increase in calls for police services, but would not require new or physically altered police facilities in order to maintain acceptable performance objectives (Criterion 1). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact PSR-2: Adoption and development under the Specific Plan could result in an increase in calls for fire protection and emergency medical response services, but would not require new or physically altered fire protection facilities in order to maintain acceptable performance objectives (Criterion 1). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact PSR-3: Adoption and development under the Specific Plan could result in new students for local schools, but would not require new or physically altered school facilities to maintain acceptable performance objectives (Criterion 1). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact PSR-4: Adoption and development under the Specific Plan could increase the use of existing neighborhood and regional parks and recreation centers, but not to the extent that substantial physical deterioration of the facilities would occur or be accelerated, nor would it cause the necessity for new or expanded facilities (Criteria 1 through 3). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧

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TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Public Services, Parks and Recreation (cont.)				
Impact PSR-5: Adoption and development under the Specific Plan, in combination with other past, present, existing, approved, pending, and reasonably foreseeable future projects within and around the Plan Area, would not result in a cumulative increase in demand for police, fire, and school services. (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact PSR-6: Adoption and development under the Specific Plan, in combination with other past, present, existing, approved, pending, and reasonably foreseeable future projects within and around the Specific Plan Area, would result in an increased demand for recreational facilities. (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Transportation and Circulation[5]				
Impact TRANS-1: The development under the Specific Plan would degrade the *MacArthur Boulevard/Piedmont Avenue* intersection (Intersection #13) from LOS D to LOS E (Significant Threshold #1) during the weekday PM peak hour under Existing Plus Project conditions. (Significant)	LS	LS⇩	LS⇩	?
Impact TRANS-2: The development under the Specific Plan would degrade the *Perry Place/I-580 Eastbound Ramps/ Oakland Avenue* intersection (Intersection #15) from LOS E to LOS F and increase intersection average delay by four seconds or more (Significant Threshold #2) during the weekday PM peak hour under Existing Plus Project conditions. (Significant and Unavoidable)	SU	? ⇩	?⇩	SU⇧
Impact TRANS-3: The development under the Specific Plan would degrade overall intersection operations from LOS E to LOS F and increase intersection average delay by four seconds or more (Significant Threshold #2) at the *Lake Park Avenue/Lakeshore Avenue* intersection (Intersection #17) during the weekday PM peak hour under Existing Plus Project conditions. (Significant)	LS	LS⇩	LS⇩	?⇧

[5] As permitted by CEQA, the effects of the alternatives are discussed in less detail than the impact discussions for the Specific Plan in Chapter 4 (CEQA Guidelines Section 15126.6[d]). For this reason, the effects of each alternative at specific intersections has been assessed relative to the effects of the Specific Plan and are determined either to be reduced or more severe. However, final impact determinations for specific intersections have not been concluded.

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TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Transportation and Circulation (cont.)				
Impact TRANS-4: The development under the Specific Plan Project would add more than 10 peak-hour trips to *24th Street/Broadway* intersection (Intersection #36) which would meet peak-hour signal warrant (Significant Threshold #6) under Existing Plus Project conditions. (Significant)	LS	LS⇩	LS⇩	LS⇧
Impact TRANS-5: The development under the Specific Plan Project would add more than 10 peak-hour trips to *23rd Street/Broadway* intersection (Intersection #39) which would meet peak-hour signal warrant (Significant Threshold #6) under Existing Plus Project conditions. (Significant)	LS	LS⇩	LS⇩	LS⇧
Impact TRANS-6: The development under the Specific Plan Project would add more than 10 peak-hour trips to *23rd Street/Harrison Street* intersection (Intersection #40) which would meet peak-hour signal warrant (Significant Threshold #6) under Existing Plus Project conditions. (Significant and Unavoidable)	Conservatively SU	Conservatively SU⇩	Conservatively SU⇩	Conservatively SU⇧
Impact TRANS-7: The development under the Specific Plan would degrade the intersection from LOS E to LOS F and increase intersection average delay by four seconds or more (Significant Threshold #2) at the *Perry Place/I-580 Eastbound Ramps/ Oakland Avenue* intersection (Intersection #15) which would operate at LOS F during the weekday PM peak hour under 2020 conditions. (Significant and Unavoidable)	SU	LS⇩	LS⇩	SU⇧
Impact TRANS-8: The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more (Significant Threshold #5) during the weekday PM peak hour which would operate at LOS F under 2020 conditions at the *Lake Park Avenue/Lakeshore Avenue* intersection (Intersection #17). (Significant and Unavoidable)	SU	?⇩	?⇩	SU⇧
Impact TRANS-9: The development under the Specific Plan Project would add more than 10 peak-hour trips to *24th Street/Broadway* intersection (Intersection #36) which would meet peak-hour signal warrant (Significant Threshold #6) under 2020 Plus Project conditions. (Significant)	LS	LS⇩	LS⇩	LS⇧

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TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Transportation and Circulation (cont.)				
Impact TRANS-10: The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more (Significant Threshold #5) at an intersection operating at LOS F during the weekday AM and PM peak hours at the *27th Street/24th Street/Bay Place/Harrison Street* intersection (Intersection #37) under 2020 conditions. (Significant and Unavoidable)	SU	?⇩	SU⇩	SU⇧
Impact TRANS-11: The development under the Specific Plan Project would add more than 10 peak-hour trips to *23rd Street/Broadway* intersection (Intersection #39) which would meet peak-hour signal warrant (Significant Threshold #6) under 2020 Plus Project conditions. (Significant)	LS	LS⇩	LS⇩	LS⇧
Impact TRANS-12: The development under the Specific Plan Project would add more than 10 peak-hour trips to *23rd Street/Harrison Street* intersection (Intersection #40) which would meet peak-hour signal warrant (Significant Threshold #6) under 2020 Plus Project conditions. (Significant and Unavoidable)	Conservatively SU	Conservatively SU⇩	Conservatively SU⇩	Conservatively SU⇧
Impact TRANS-13: The development under the Specific Plan would increase the v/c ratio for the total intersection by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more (Significant Threshold #5) at the West *Grand Avenue/Northgate Avenue* intersection (Intersection #47) which would operate at LOS F during the PM peak hour in 2020. (Significant and Unavoidable)	SU	?⇩	?⇩	SU⇧
Impact TRANS-14: The development under the Specific Plan would increase the v/c ratio for a critical movement by 0.05 or more (Significant Threshold #5) during the weekday PM and Saturday peak hours at the *51st Street/Pleasant Valley Avenue/Broadway* intersection (Intersection #7) under 2035 conditions. (Significant and Unavoidable)	SU	?⇩	SU⇩	SU⇧
Impact TRANS-15: The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more (Significant Threshold #5) during the weekday PM peak hour at the *40th Street/Telegraph Avenue* intersection (Intersection #8) under 2035 conditions. (Significant)	LS	LS⇩	LS⇩	?⇧

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TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Transportation and Circulation (cont.)				
Impact TRANS-16: The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more (Significant Threshold #5) at an intersection operating at LOS F during the weekday PM peak hour at the *West MacArthur Boulevard/Telegraph Avenue* intersection (Intersection #11) under 2035 conditions. (Significant)	LS	LS⇩	LS⇩	?⇧
Impact TRANS-17: The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more (Significant Threshold #5) at an intersection operating at LOS F during the weekday PM peak hour at the *Perry Place/I-580 Eastbound Ramps/ Oakland Avenue* intersection (Intersection #15) under 2035 conditions. (Significant and Unavoidable)	SU	? ⇩	?⇩	SU⇧
Impact TRANS-18: The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more (Significant Threshold #5) at an intersection operating at LOS F during the Saturday peak hour at the *Grand Avenue/Lake Park Avenue/Santa Clara Avenue* intersection (Intersection #16) under 2035 conditions. (Significant and Unavoidable)	SU	LS⇩	LS⇩	SU⇧
Impact TRANS-19: The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more (Significant Threshold #5) at the *Lake Park Avenue/Lakeshore Avenue* intersection (Intersection #17) during the weekday PM and Saturday peak hours which would operate at LOS F under 2035 conditions. (Significant and Unavoidable)	SU	?⇩	SU⇩	SU⇧
Impact TRANS-20: The development under the Specific Plan would degrade overall intersection operations from LOS E to LOS F and increase intersection average delay by four seconds or more (Significant Threshold #2) during the weekday PM peak hour at the *Piedmont Avenue/Broadway and Hawthorne Avenue/Brook Street/Broadway* intersection (Intersections #20 and #21) under 2035 conditions. (Significant and Unavoidable)	SU	LS⇩	LS⇩	SU⇧
Impact TRANS-21: The development under the Specific Plan would increase the v/c ratio for the total intersection by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more (Significant Threshold #5) at the *27th Street/Telegraph Avenue* intersection (Intersection #29) which would operate at LOS F during the weekday PM peak hour under 2035 conditions. (Significant and Unavoidable)	SU	?⇩	SU⇩	SU⇧

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TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Transportation and Circulation (cont.)				
Impact TRANS-22: The development under the Specific Plan would degrade overall intersection operations from LOS E to LOS F and increase intersection average delay by four seconds or more (Significant Threshold #2) during the weekday PM peak hour and at the *27th Street/ Broadway* intersection (Intersection #30) under 2035 conditions. (Significant and Unavoidable)	SU	?⇩	SU⇩	SU⇧
Impact TRANS-23: The development under the Specific Plan Project would add more than 10 peak-hour trips to *24th Street/Broadway* intersection (Intersection #36) which would meet peak-hour signal warrant (Significant Threshold #6) under 2035 Plus Project conditions. (Significant)	LS	LS⇩	LS⇩	LS⇧
Impact TRANS-24: The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more (Significant Threshold #5) at an intersection operating at LOS F during the weekday AM and PM peak hours and degrade overall intersection operations from LOS E to LOS F and increase intersection average delay by four seconds or more (Significant Threshold #2) during the Saturday peak hour at the *27th Street/24th Street/Bay Place/Harrison Street* intersection (Intersection #37) under 2035 conditions. (Significant and Unavoidable)	SU	SU⇩	SU⇩	SU⇧
Impact TRANS-25: The development under the Specific Plan Project would add more than 10 peak-hour trips to *23rd Street/Broadway* intersection (Intersection #39) which would meet peak-hour signal warrant (Significant Threshold #6) under 2035 Plus Project conditions. (Significant)	LS	LS⇩	LS⇩	LS⇧
Impact TRANS-26: The development under the Specific Plan Project would add more than 10 peak-hour trips to *23rd Street/Harrison Street* intersection (Intersection #40) which would meet peak-hour signal warrant (Significant Threshold #6) under 2035 Plus Project conditions. (Significant and Unavoidable)	Conservatively SU	Conservatively SU⇩	Conservatively SU⇩	Conservatively SU⇧
Impact TRANS-27: The development under the Specific Plan would increase the v/c ratio for the total intersection by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more (Significant Threshold #5) at the West *Grand Avenue/Northgate Avenue* intersection (Intersection #47) which would operate at LOS F during the weekday PM peak hour in 2035. (Significant and Unavoidable)	SU	?⇩	SU⇩	SU⇧

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TABLE 5-5 (Continued)
SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Transportation and Circulation (cont.)				
Impact TRANS-28: The development under the Specific Plan would degrade intersection operations from LOS D to LOS F and increase intersection average delay by four seconds or more (Significant Threshold #2) during the weekday PM peak hour at the *Grand Avenue/Broadway* intersection (Intersection #49) in 2035. (Significant and Unavoidable)	SU	LS⇩	LS⇩	SU⇧
Impact TRANS-29: The development under the Specific Plan would degrade from LOS E or better to LOS F or increase the v/c ratio by 0.03 or more for segments operating at LOS F on the following CMP or MTS roadway segments: • MacArthur Boulevard in both eastbound and westbound directions between Piedmont Avenue and I-580 in 2020 and 2035. • Grand Avenue in the eastbound direction from Adeline Street to MacArthur Boulevard, and in westbound direction from Harrison Street to San Pablo Avenue in 2035. • Broadway in the northbound direction from 27th Street to College Avenue, and in the southbound direction from Piedmont Avenue to 27th Street in 2035. • Telegraph Avenue in the northbound direction from MacArthur Boulevard to Shattuck Avenue in 2035. • San Pablo Avenue in the southbound direction from Market Street to 27th Street in 2035. • Harrison Street in the northbound direction from 27th Street to Oakland Avenue in 2035. (Significant and Unavoidable)	SU	?⇩	SU⇩	SU⇧
Utilities and Service Systems				
Impact UTIL-1: The water demand generated by adoption and development under the Specific Plan would not exceed water supplies available from existing entitlements and resources (Criterion 3). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact UTIL-2: Adoption and development under the Specific Plan would not exceed the wastewater treatment requirements of the San Francisco Regional Water Quality Control Board or result in a determination that new or expanded wastewater treatment facilities would be required (Criteria 1 and 4). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧

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SUMMARY COMPARISON OF IMPACTS: SPECIFIC PLAN AND ALTERNATIVES

Environmental Impact	Specific Plan (Broadway Valdez Development Program)	No Project Alternative 1	Partially Mitigated Alternative 2 (including the Historic Preservation Sub-Alternative)	Maximum Theoretical Buildout Alternative 3
Utilities and Service Systems (cont.)				
Impact UTIL-3: Adoption and development under the Specific Plan would not require or result in construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects (Criteria 2). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact UTIL-4: Adoption and development under the Specific Plan would not violate applicable federal, state, and local statutes and regulations related to solid waste; nor generate solid waste that would exceed the permitted capacity of the landfills serving the area (Criteria 5 and 6). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact UTIL-5: Adoption and development under the Specific Plan would not violate applicable federal, state and local statutes and regulations relating to energy standards; nor result in a determination by the energy provider which serves or may serve the area that it does not have adequate capacity to serve projected demand in addition to the providers' existing commitments and require or result in construction of new energy facilities or expansion of existing facilities (Criteria 7 and 8). (Less than Significant)	LS	LS⇩	LS⇩	LS⇧
Impact UTIL-6: Adoption and development under the Specific Plan in combination with other past, present, existing, approved, pending, and reasonably foreseeable future projects within and around the Plan Area, would result in an increased demand for utilities services. (Less than Significant)	LS	LS⇩	LS⇩	LS⇧

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CHAPTER 6
Impact Overview and Growth Inducement

6.1 Significant, Unavoidable and Cumulative Environmental Impacts

A significant and unavoidable impact would result if a project were to reach or exceed the defined threshold of significance and no feasible mitigation measure were available to reduce the significant impact to a less-than-significant level. Adoption and development under the Broadway Valdez District Specific Plan would result in the following significant and unavoidable (SU) impacts or cumulative impacts, as identified in Chapter 4 of this EIR.

SU Aesthetics, Shadow, and Wind Impacts

- **Impact AES-4:** Adoption and development under the Specific Plan could result in substantial new shadow that could the Temple Sinai. Although Mitigation Measure AES-4 would require a shadow study to evaluate the shadowing effects, it cannot be known with certainty that a project redesign would eliminate the potential for new significant shading on the Temple Sinai. Therefore, the impact is conservatively deemed significant and unavoidable.

- **Impact AES-5:** Adoption and development under the Specific Plan has the potential to result in adverse wind conditions in cases where structures 100 feet in height or taller are proposed for development. Although Mitigation Measure AES-5 would require a wind study to evaluate the effects of proposed development, it cannot be known with certainty that a project redesign would eliminate the potential for new adverse wind impacts. Therefore, the impact is conservatively deemed significant and unavoidable.

- **Impact AES-6:** For the reasons listed above, adoption and development under the Specific Plan is conservatively deemed to result in significant cumulative wind, and shadow impacts. Therefore, adoption and development under the Specific Plan, in combination with other past, present, and reasonably foreseeable future projects within and around the Plan Area also is conservatively deemed significant and unavoidable.

SU Air Quality Impacts

- **Impact AIR-1:** Construction associated with adoption and development under the Specific Plan would result in average daily emissions in excess of 54 pounds per day of ROG. With the inclusion of Recommended Measure AIR-1, it cannot reliably be demonstrated that ROG emissions from application of architectural coatings associated with adoption and development under the Specific Plan would be reduced to 54 pounds per day or less. To

assess full buildout of the Broadway Valdez Development Program under this threshold, which is intended for project-level analysis, aggressive and conservative assumptions were employed and thus yielded a conservative result. Therefore, the impact is conservatively deemed significant and unavoidable.

- **Impact AIR-2:** Adoption and development under the Specific Plan would result in operational average daily emissions of more than 54 pounds per day of ROG, NOX, or $PM_{2.5}$; 82 pounds per day of PM_{10}; or result in maximum annual emissions of 10 tons per year of ROG, NOX, or $PM_{2.5}$ or 15 tons per year of PM_{10}. Although implementation of SCA 25 and Recommended Measure AIR-2 would reduce environmental effects on air quality, adoption and development under the Specific Plan still would contribute substantially to an existing air quality violation (ozone precursors and particulate matter). Therefore, even with implementation of Recommended Measure AIR-2, this impact would remain significant and unavoidable for emissions of ROG, NOX, and PM_{10}. To assess full buildout of the Broadway Valdez Development Program under this threshold, which is intended for project-level analysis, aggressive and conservative assumptions were employed and thus yielded a conservative result. Therefore, the significant and unavoidable determination is considered conservative.

- **Impact AIR-4:** Adoption and development under the Specific Plan could generate substantial levels of Toxic Air Contaminants (TACs) under cumulative conditions resulting in (a) a cancer risk level greater than 100 in a million, (b) a non-cancer risk (chronic or acute) hazard index greater than 10.0, or (c) annual average $PM_{2.5}$ of greater than 0.8 micrograms per cubic meter as a result of project operations. Although, due to the BAAQMD's permitting requirements, residual risk for a given generator would be less than 10 in one million, and although implementation of Mitigation Measure AIR-4 would substantially reduce potential cancer risks associated with DPM, the degree to which multiple sources, if concentrated on one area, would maintain cumulative risks to below 100 in one million cannot be assured. Therefore, the impact is conservatively deemed significant and unavoidable.

SU Cultural Resources Impacts

- **Impact CUL-1:** Adoption and development under the Specific Plan could result in the physical demolition, destruction, relocation, or alteration of historical resources that are listed in or may be eligible for listing in the federal, state, or local registers of historical resources.

- **Impact CUL-5:** Adoption and development under the Specific Plan, combined with cumulative development in the Plan Area and citywide, including past, present, existing, approved, pending, and reasonably foreseeable future development, would contribute considerably to a significant adverse cumulative impact to cultural resources.

SU Greenhouse Gas Impacts

- **Impact GHG-1:** Adoption and development under the Specific Plan would produce greenhouse gas emissions that exceed 1,100 metric tons of $CO2_e$ per year that would exceed the project-level threshold of 4.6 metric tons of $CO2_e$ per service population annually. Although future projects under the Specific Plan would be subject to SCA F, GHG Reduction Plan, according to the specific applicability criteria, and GHG emissions

would be reduced through project-by-project implementation of project-specific reduction measures, it cannot be guaranteed that sufficient reductions can be achieved. Therefore, the impact is conservatively deemed significant and unavoidable.

SU Noise Impacts

- **Impact NOI-5:** Traffic generated by adoption and development under the Specific Plan could substantially increase traffic noise levels in the Plan Area.

- **Impact NOI-6:** Traffic generated by adoption and development under the Specific Plan, in combination with traffic from past, present, existing, approved, pending and reasonably foreseeable future projects, could substantially increase traffic noise levels in the Plan Area; and construction and operational noise levels in combination with traffic from past, present, existing, approved, pending and reasonably foreseeable future projects, could increase ambient noise levels.

- **Impact NOI-7:** Adoption and development under the Specific Plan could result in stationary noise sources, such as rooftop mechanical equipment and back-up generators; that when combined with noise from traffic generated by adoption and development under the Specific Plan; as well as from and from past, present, existing, approved, pending and reasonably foreseeable future projects; could substantially increase noise levels at sensitive land uses in the Plan Area.

SU Transportation and Circulation Impacts

Existing Plus Project Conditions

- **Impact TRANS-2:** The development under the Specific Plan would degrade the *Perry Place/I-580 Eastbound Ramps/ Oakland Avenue* intersection **(Intersection #15)** from LOS E to LOS F and increase intersection average delay by four seconds or more during the weekday PM peak hour under Existing Plus Project conditions.

- **Impact TRANS-6:** The development under the Specific Plan Project would add more than 10 peak-hour trips to *23rd Street/Harrison Street* intersection **(Intersection #40)** which would meet peak-hour signal warrant under Existing Plus Project conditions. Although, with implementation of Mitigation Measure TRANS-6, this intersection may improve to LOS A during both weekday PM and Saturday peak hours, the specific improvements may result in potential secondary impacts at Grand Avenue/Harrison Street intersection (Intersection #52). Therefore, the impact is conservatively deemed significant and unavoidable.

2020 Plus Project Conditions

- **Impact TRANS-7:** The development under the Specific Plan would degrade the intersection from LOS E to LOS F and increase intersection average delay by four seconds or more, increase the total intersection v/c ratio by 0.03 or more, and increase the v/c ratio for a critical movement by 0.05 or more at the *Perry Place/I-580 Eastbound Ramps/ Oakland Avenue* intersection **(Intersection #15)** which would operate at LOS F during the weekday PM peak hour under 2020 conditions.

- **Impact TRANS-8:** The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more during the weekday PM peak hour which would operate at LOS F under 2020 conditions at the *Lake Park Avenue/Lakeshore Avenue* intersection **(Intersection #17)**.

- **Impact TRANS-10:** The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at an intersection operating at LOS F during the weekday AM and PM peak hours at the *27th Street/24th Street/Bay Place/Harrison Street* intersection **(Intersection #37)** under 2020 conditions.

- **Impact TRANS-12:** The development under the Specific Plan Project would add more than 10 peak-hour trips to *23rd Street/Harrison Street* intersection **(Intersection #40)** which would meet peak-hour signal warrant under 2020 Plus Project conditions. Although, with implementation of Mitigation Measure TRANS-6, this intersection may improve to LOS B during the weekday PM peak hour and LOS A during the Saturday peak hour, the specific improvements may result in potential secondary impacts at Grand Avenue/Harrison Street intersection (Intersection #52). Therefore, the impact is conservatively deemed significant and unavoidable.

- **Impact TRANS-13:** The development under the Specific Plan would increase the v/c ratio for the total intersection by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at the West *Grand Avenue/Northgate Avenue* intersection **(Intersection #47)** which would operate at LOS F during the PM peak hour in 2020.

2035 Plus Project Conditions

- **Impact TRANS-14:** The development under the Specific Plan would increase the v/c ratio for a critical movement by 0.05 or more during the weekday PM and Saturday peak hours at the *51st Street/Pleasant Valley Avenue/Broadway* intersection **(Intersection #7)** under 2035 conditions.

- **Impact TRANS-17:** The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at an intersection operating at LOS F during the weekday PM peak hour at the *Perry Place/I-580 Eastbound Ramps/ Oakland Avenue* intersection **(Intersection #15)** under 2035 conditions.

- **Impact TRANS-18:** The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more at an intersection operating at LOS F during the Saturday peak hour at the *Grand Avenue/Lake Park Avenue/Santa Clara Avenue* intersection **(Intersection #16)** under 2035 conditions.

- **Impact TRANS-19:** The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at the *Lake Park Avenue/Lakeshore Avenue* intersection **(Intersection #17)** during the weekday PM and Saturday peak hours which would operate at LOS F under 2035 conditions.

- **Impact TRANS-20:** The development under the Specific Plan would degrade overall intersection operations from LOS E to LOS F and increase intersection average delay by four seconds or more during the weekday PM peak hour at the *Piedmont Avenue/Broadway and Hawthorne Avenue/Brook Street/Broadway* intersections **(Intersections #20 and #21)** under 2035 conditions.

- **Impact TRANS-21:** The development under the Specific Plan would increase the v/c ratio for the total intersection by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at the *27th Street/Telegraph Avenue* intersection **(Intersection #29)** which would operate at LOS F during the weekday PM peak hour under 2035 conditions.

- **Impact TRANS-22:** The development under the Specific Plan would degrade overall intersection operations from LOS E to LOS F and increase intersection average delay by four seconds or more during the weekday PM peak hour and at the *27th Street/ Broadway* intersection **(Intersection #30)** under 2035 conditions.

- **Impact TRANS-24:** The development under the Specific Plan would increase the total intersection v/c ratio by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at an intersection operating at LOS F during the weekday AM and PM peak hours and degrade overall intersection operations from LOS E to LOS F and increase intersection average delay by four seconds or more during the Saturday peak hour at the *27th Street/24th Street/Bay Place/Harrison Street* intersection **(Intersection #37)** under 2035 conditions.

- **Impact TRANS-26:** The development under the Specific Plan Project would add more than 10 peak-hour trips to *23rd Street/Harrison Street* intersection **(Intersection #40)** which would meet peak-hour signal warrant under 2035 Plus Project conditions. Although, with implementation of Mitigation Measure TRANS-6, this intersection may improve to LOS B during the weekday PM peak hour and LOS A during the Saturday peak hour, the specific improvements may result in potential secondary impacts at Grand Avenue/Harrison Street intersection (Intersection #52). Therefore, the impact is conservatively deemed significant and unavoidable.

- **Impact TRANS-27:** The development under the Specific Plan would increase the v/c ratio for the total intersection by 0.03 or more and increase the v/c ratio for a critical movement by 0.05 or more at the West *Grand Avenue/Northgate Avenue* intersection **(Intersection #47)** which would operate at LOS F during the weekday PM peak hour in 2035.

- **Impact TRANS-28:** The development under the Specific Plan would degrade intersection operations from LOS D to LOS F and increase intersection average delay by four seconds or more during the weekday PM peak hour at the *Grand Avenue/Broadway* intersection **(Intersection #49)** in 2035.

Roadway Segment Evaluation

- **Impact TRANS-29:** The development under the Specific Plan would degrade from LOS E or better to LOS F or increase the v/c ratio by 0.03 or more for segments operating at LOS F on the following CMP or MTS roadway segments:

  - MacArthur Boulevard in both eastbound and westbound directions between Piedmont Avenue and I-580 in 2020 and 2035.

- Grand Avenue in the eastbound direction from Adeline Street to MacArthur Boulevard, and in westbound direction from Harrison Street to San Pablo Avenue in 2035.
- Broadway in the northbound direction from 27th Street to College Avenue, and in the southbound direction from Piedmont Avenue to 27th Street in 2035.
- Telegraph Avenue in the northbound direction from MacArthur Boulevard to Shattuck Avenue in 2035.
- San Pablo Avenue in the southbound direction from Market Street to 27th Street in 2035.
- Harrison Street in the northbound direction from 27th Street to Oakland Avenue in 2035.

Previous environmental documents have identified intersections that either currently operate at an unacceptable LOS or are projected to operate at an unacceptable LOS in the future. This EIR identifies these intersections as "impacted intersections" because components of the proposed project may affect those locations. Appendix G presents the intersections that previously published environmental documents identified as having significant and unavoidable impacts.

6.2 Growth-Inducing Impacts

This section addresses the ways in which the adoption and development under the Specific Plan "could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment" (Section 15126.2(d) of the CEQA Guidelines). The section summarizes topics and impacts also addressed in Section 4.11 *Population, Housing, and Employment*, which provides the context for evaluating growth-inducing impacts.

6.2.1 Adoption and Development Under the Specific Plan Would Foster Growth in the Plan Area

The Broadway Valdez Specific Plan established the Broadway Valdez Development Program, which is shown below in **Table 6-1**. As described in Chapter 3, *Project Description*, the Broadway Valdez Development Program represents the *reasonably foreseeable maximum development* that the City has projected can reasonably be expected to occur in the Plan Area over the next 25 years, and is thus the level of development envisioned by the Specific Plan and analyzed in this EIR. In total, approximately 3.7 million square feet of development is envisioned, including approximately 1,800 residential units, and a new 180-room hotel. These developments would support Plan Area growth of business activity with approximately 4,505 additional jobs and growth of approximately 1,730 households with 3,230 additional residents.

TABLE 6-1
BROADWAY VALDEZ DEVELOPMENT PROGRAM

	Valdez Triangle Subarea	North End Subarea	Total Plan Area (Rounded)[a]
Residential Units	1,030	767	1,800
Office (sq. ft.)	116,000	579,000	695,000
Retail (sq. ft.)	794,000	321,000	1,114,000
Hotel Rooms	180	-	180
Non-Residential Development (sq. ft.)	1,027,000	899,000	1,927,000
Total Development (sq. ft.)	**2,057,000**	**1,666,000**	**3,723,000**

[a] Totals are rounded for consistency with the Project Description (Chapter 3).

SOURCE: WRT, 2013.

This growth would not otherwise occur at this pace within the Plan Area. Compared to growth anticipated citywide, the Broadway Valdez Development Program would contribute about five percent of the employment growth and about two percent of the population growth anticipated (see Section 4.11, *Population, Housing, and Employment*).

6.2.2 Adoption and Development under the Specific Plan is Unlikely to Induce Substantial Additional Growth Outside the Plan Area

No Infrastructure-Induced Growth

Typical examples of projects likely to have significant growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and the development of new residential subdivisions or industrial parks in areas that are currently only sparsely developed or are undeveloped. In this case, development under the Specific Plan would occur in already developed areas in a location well-served by existing transportation/transit systems and other infrastructure and utilities. Unlike development on vacant land in an outlying part of the region, the development under the Specific Plan would occur in an already developed urban area and would not require construction or extension of new roads, utilities, and other infrastructure that might stimulate population and employment growth in previously undeveloped areas. Adoption and development under the Specific Plan could require on-site infrastructure replacements and improvements to accommodate new development to higher densities and for new uses. The infrastructure improvements would be specific to the development sites and would not induce substantial additional population growth in other areas.

Job-Induced Population Growth

Employment growth resulting from adoption and development under the Specific Plan would support the growth of households and population to provide the additional workers. The housing

development anticipated under the Broadway Valdez Development Program also would temporarily generate additional workers. Cumulatively, citywide growth of employed residents in Oakland (59 percent increase) is projected to exceed the growth of jobs over time (49 percent increase). Thus, cumulatively, the substantial growth of housing and population anticipated to occur throughout the City could accommodate the number of additional workers resulting from adoption and development under the Specific Plan as well as the number of additional workers associated with other cumulative job growth.

Growth Supported By Additional Spending

The major retail and mixed-use developments anticipated with adoption and development under the Specific Plan would bring visitors, patrons, and shoppers to the Plan Area. Their spending would support the businesses and employees to be located in the new developments. There also could be some additional spending that would support businesses in the vicinity of the Plan Area. The additional spending is unlikely to result in the construction of new facilities because of the large amount of retail and commercial space to be developed as a result of the Specific Plan, and the availability of commercial space in existing buildings within the Plan Area and vicinity.

6.2.3 Adoption and Development under the Specific Plan Would Reduce Growth Pressures Elsewhere in the Region

From a regional perspective, the adoption and development under the Specific Plan would affect the distribution and location of growth within the East Bay and Bay Area region. It would result in more growth in Oakland and the Plan Area, at the center of the region, and less growth in other areas. As a result of adoption and development under the Specific Plan, retail and commercial developments in the Plan Area would capture activity that would otherwise locate elsewhere in the East Bay and/or Bay Area. Development of major retail shopping in the Plan Area would increase shopping opportunities in Oakland and stem the leakage of retail spending to areas outside of Oakland in the East Bay and San Francisco. Thus, adoption and development under the Specific Plan would facilitate retail and commercial development in a central, regional location with good transportation/transit accessibility from throughout the region. It would facilitate retail development in proximity to Oakland consumers thereby reducing their travel distances for shopping trips.

Adoption and development under the Specific Plan would accommodate more population growth in a location with strong housing demand, thereby reducing demand for housing in more outlying locations. Higher-density housing in the Plan Area at the center of the region would likely result in a larger total regional housing supply than would a more dispersed, lower-density pattern of regional development. Further, it would likely result in more housing in proximity to public transportation and employment centers in the Central Bay Area.

6.2.4 Summary

Overall, the effects of adoption and development under the Specific Plan on growth would be largely beneficial and are not considered substantial and adverse.

6.3 Significant Irreversible Environmental Effects

An EIR must identify any significant irreversible environmental changes that could result from adoption and development under the Specific Plan. These may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses. CEQA dictates that irretrievable commitments of resources should be evaluated to assure that such current consumption is justified (CEQA Guidelines §15126.2(c)). The CEQA Guidelines identify three distinct categories of significant irreversible changes: (1) changes in land use that would commit future generations; (2) irreversible changes from environmental actions; and (3) consumption of non-renewable resources.

6.3.1 Changes in Land Use Which Would Commit Future Generations

Adoption and development under the Specific Plan would result in growth and development in the approximately 95.5-acre area along Oakland's Broadway corridor between Grand Avenue and Interstate 580. Adoption and development under the Specific Plan is consistent with the land use designated by the City of Oakland's General Plan. Because the development under the Specific Plan would occur within an urban area surrounded by similar or compatible uses, it would not commit future generations to significant changes in land use.

6.3.2 Irreversible Changes from Environmental Accidents

No significant irreversible environmental damage, such as what could occur as a result of an accidental spill or explosion of hazardous materials, is anticipated due to adoption and development under the Specific Plan. Furthermore, compliance with federal, State, and local regulations, and the implementation of the City's Standard Conditions of Approval associated with hazards and hazardous materials (SCAs 35, 41, 61-69, and 74) identified in Section 4.7, *Hazards and Hazardous Materials*, would reduce to a less-than-significant level the possibility that hazardous substances within the Plan Area would cause significant environmental damage.

6.3.3 Consumption of Non-Renewable Resources

Consumption of non-renewable resources includes conversion of agricultural lands, loss of access to mining reserves, and use of non-renewable energy sources. The Plan Area is located within an urban area of Oakland; no agricultural land would be converted to non-agricultural uses. The Plan Area does not contain known mineral resources and does not serve as a mining reserve.

Adoption and development under the Specific Plan would require the use of energy, including energy produced from non-renewable resources. However, the future development projects under the Specific Plan would incorporate energy-conserving features, as required by the Uniform Building Code and California Energy Code Title 24, the City's Green Building Ordinance, and, as applicable, the City's Standard Conditions of Approval.

6.4 Effects Found Not To Be Significant

A Notice of Preparation (NOP) was circulated on April 30, 2012, and public scoping meetings were held on May 16, 2012 at the Planning Commission and May 14, 2012 at the Landmarks Preservation Advisory Board, to solicit comments from the public and city officials about the scope of this EIR. Written comments received on the NOP were considered in the preparation of the final scope for this document and in the evaluation of the adoption and development under the Specific Plan. An Initial Study was not prepared for the Specific Plan.

The NOP prepared for this EIR indicated there would likely be environmental effects on aesthetics, shadow and wind; air quality and greenhouse gases; biological resources; cultural and historic resources; geology, soils and seismicity; hazardous materials; hydrology, water quality and water supply; land use; noise; population and housing; public services and utilities; and transportation and circulation, among other topics. These environmental topics have been fully analyzed in this document (Chapter 4).

The following two topics from the CEQA Environmental Checklist were excluded from discussion in the EIR because it was determined during the scoping phase that there would be no impacts to these issues:

6.4.1 Agricultural Resources

As discussed in Section 4.9 (*Land Use, Plans, and Policies*), the Oakland General Plan Land Use Map designates various urban residential, commercial, and mixed-use land use classifications in and surrounding the Plan Area. The Plan Area, as with the majority of developed land in the City of Oakland, is designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as Urban and Built-Up Land (Department of Conservation, 2011). Therefore, adoption and development under the Specific Plan would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use; would not conflict with existing zoning for agricultural use or a Williamson Act contract; and would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use. Adoption and development under the Specific Plan would have no impact on agricultural resources.

6.4.2 Mineral Resources

According to the City's OSCAR Element of the General Plan, the Plan Area is located in a developed urban area that has no known existing mineral resources. The California Geological

Survey (CGS) has classified lands within the San Francisco Bay Region into Mineral Resource Zones (MRZs) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act (SMARA) of 1974 (Stinson et al., 1982). The Plan Area is mapped by the California Department of Mines and Geology (CDMG) as Mineral Resource Zones MRZ-1—an area where adequate information indicates a low likelihood of significant mineral resources (Stinson, et al., 1982). The intent of designating significant deposits is to identify areas where mineral extraction could occur prior to development. Adoption and development under the Specific Plan would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Adoption and development under the Specific Plan would have no impact on mineral resources.

6.5 References

City of Oakland, 2007. *Land Use and Transportation Element of the Oakland General Plan*, March 24, 1998, amended to June 21, 2007.

City of Oakland, 1996. *Open Space, Conservation and Recreation (OSCAR), An Element of the Oakland General Plan,* adopted June 11, 1996.

California Department of Conservation, Map of Prime Farmland in Alameda County, 2011.

Stinson, M. C., M. W. Manson, J. J. Plappert, and others, Mineral Land Classification: Aggregate Materials in the San Francisco-Monterey Bay Area, Part II, Classification of Aggregate Resource Areas South San Francisco Bay Production-Consumption Region, California Division of Mines and Geology Special Report 146, 1982.

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CHAPTER 7
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